

# Rehabilitation Services Policy Manual

SECTION Pre-Employment Transition Services (Pre-ETS)  
PART Purpose, Funding, and Coordination

SECTION NO. 7-1  
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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 1 Purpose, Funding, Collaboration and Coordination

Empowering students with disabilities to achieve their highest employment potential is one of the major goals of Rehabilitation Services (RS). Pre-ETS were authorized by the [Rehabilitation Act of 1973, as amended through the Workforce Innovation and Opportunity Act \(WIOA\)](#). Through Pre-ETS, students with disabilities may receive a variety of services to help them prepare for employment.

#### Pre-ETS funding

As required by WIOA, RS will reserve at least 15% of its federal vocational rehabilitation funds to provide or arrange for the provision of Pre-ETS for students with disabilities. Pre-ETS are the only activities that RS may pay for with the funds reserved.

Pre-ETS includes a specific set of activities which may be charged to the 15 percent minimum reserve:

- “Required” activities ([Section 113\(b\) of the Act](#) and [34 C.F.R. § 361.48\(a\)\(2\)](#));
- “Authorized” activities ([Section 113\(c\) of the Act](#) and [34 C.F.R. § 361.48\(a\)\(3\)](#)); and
- “Pre-employment transition coordination” activities ([Section 113\(d\) of the Act](#) and [34 C.F.R. § 361.48\(a\)\(4\)](#)).

#### [34 CFR 361.65\(a\)\(3\)](#)

Pre-employment transition services are not subject to economic need.

#### Collaboration

Collaboration between VR and Special Education is essential to assure that students with disabilities have access to the continuum of services they need to identify career interests which may be further explored through additional vocational rehabilitation (VR) services, such as transition services and other individualized VR services.

Pre-employment transition services are to be provided and arranged in collaboration with local education agencies. RS, in collaboration with local educational agencies (LEAs), provide, or arrange for the provision of, pre-employment transition services for all students with disabilities, as defined in [§361.5\(c\)\(51\)](#), in need of such services, without regard to the type of disability [\(361.48\(a\)\)](#).

RS Staff time spent on arranging for the provision of one or more of the five required Pre-ETS for students with disabilities will be documented in a case note or on the required forms and in KMIS; and may include, but are not limited to:

- Working with the student, parent, providers, or community resources to arrange and ensure that the student receives the pre-employment transition services needed.
- Working with the student and school to determine which of the five required services the student needs.
- Informed choice discussion about available services, interests, and needs.

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- Scheduling or enrolling the student in services delivered by VR agency staff and/or an outside provider.
- Communicating to family and school staff the expected pre-employment transition services.
- Reviewing Pre-ETS service needs, and other VR services necessary for the individual to benefit from or participate in any of the five required pre-employment transition services, in accordance with developing an approved IPE, for eligible students with disabilities.

LEAs are obligated to provide transition services under the IDEA (Individuals with Disabilities Education Act).

- LEAs are responsible for providing and paying for any transition service that is considered special education or related services necessary for ensuring a free appropriate public education (FAPE), as required under IDEA.
- Pre-ETS provided by VR agencies may not duplicate services that are already provided by local education agencies through the IDEA.

## Coordination Activities

Pre-employment transition services include the “coordination” activities specified in [34 C.F.R. § 361.48\(a\)\(4\)](#) which are essential for arranging and providing the “required” and “authorized” activities. Each local RS office must carry out responsibilities consisting of four “pre-employment transition coordination activities” that are essential for arranging and providing pre-employment transition services.

These activities will be documented by Pre-ETS Staff on the required forms and in KMIS. Coordination activities may include:

- Attending Individualized Education Program (IEP) meetings for students with disabilities.
- Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships
- Working with schools to consult, coordinate and ensure the provision of pre-employment transition services
- Attending person-centered planning meetings.

## [34 CFR 361.48\(a\)\(4\)](#)

The Pre-ETS Transition Specialist is required to complete the [Pre-Employment Transition Services Annual Planning Guide and Partnership](#) annually with each school assigned to them by October 1<sup>st</sup> of each year. The purpose of this Pre-Employment Transition Services Annual Planning Guide and Partnership is to promote coordinated effort between Pre-ETS and the local schools in providing an effective transition, for students with disabilities, from school to work. This tool is used for Pre-ETS Transition Specialists to have discussions for effective partnership regarding operating procedures.

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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 2 Students with Disabilities and Criteria for Participation in Pre-ETS

**Pre-ETS are available to students with disabilities that meet the following criteria:**

- Individuals who meet the **definition of a student with a disability** who may need such services and are:
  - Eligible for vocational rehabilitation (VR) services, or
  - Potentially eligible for VR services (i.e., all students with disabilities, including those who have not applied or been determined eligible for VR services)

#### **Definition of a Student with a Disability**

- Students with disabilities are defined as:
  - Individuals who are not younger than age 14 (the earliest age for the provision of transition services under IDEA) through the age of 21 until they reach the age of 22, and
  - Participating in a secondary, post-secondary or other recognized education program. For the purpose of the definition of a student with a disability, educational programs include secondary education programs; non-traditional or alternative secondary education programs including home schooling; post-secondary education programs; and other recognized educational programs, such as those offered through the juvenile justice system.
  - Either eligible for and receiving special education or related services under Part B of the Individuals with Disabilities Education Act (IDEA) or is an individual with a disability as defined under Section 504 of the Rehabilitation Act.
    - An individual with a disability as defined in Section 504 means any person who:
      - (1) Has a physical or mental impairment that substantially limits one or more major life activities;
      - (2) Has a record of such an impairment; or
      - (3) Is regarded as having such an impairment.Major life activities include walking, seeing, hearing, speaking, breathing, learning, working, caring for oneself, and performing manual tasks.

#### **Verification of Disability**

RS is the only entity that can verify the individual is a student with a disability for the purpose of Pre-ETS.

Although much less documentation is required with respect to students with disabilities who are receiving Pre-ETS prior to applying or being determined eligible for VR services, it is necessary for RS to obtain some basic documentation of a disability for a potentially eligible student to ensure that:

- These students have a disability and, thus, are "potentially eligible" for VR services; and
- RS has sufficient information necessary to complete the RSA-911 Case Service Report and satisfy performance accountability requirements under [section 116 of WIOA](#).

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The requirements in [34 CFR 361.47](#) and [34 CFR 361.56](#), taken together, require RS to maintain verifying documentation in an individual's case file. The data elements required for a student with a disability who is receiving pre-employment transition services and has not applied for or been determined eligible for VR services include:

1. A unique identifier, social security number (if available)
2. Date of birth
3. Race (required if student is in elementary or secondary education)
4. Ethnicity (required if student is in elementary or secondary education)
5. Student's disability
6. Start date of pre-employment transition services
7. The pre-employment transition services provided, including the type of provider and amount expended for the service.

The above information can be obtained through the Request for Services and Information Release ([Section 7.3](#)), required services documented and must be entered into KMIS.

Supporting documentation of the student's disability, relevant to the above-identified required documentation, may include:

- Case note documenting counselor observation, review of school records, statements of education staff; or
- Request for Services and Information Release for pre-employment transition services with the identification of a student's disability, signed by school staff and parent/guardian if the student is under the age of majority in a State (parental consent to participate in pre-employment transition services is governed by State law, as well as policies of the educational programs and RS); or
- Copy of an individualized education program (IEP) document, SSA beneficiary award letter, school psychological assessment, documentation of a diagnosis or disability determination or documentation relating to 504 accommodation(s).

It is important to remember that students can still receive pre-employment transition services in the summer between high school and college, if the student has exited secondary education, and was admitted or accepted into a postsecondary program.

As far as those students who may be taking a "gap year or semester off," RS staff will need to demonstrate that the student with a disability is indeed enrolled in a recognized education program. The length of time or gap is not the issue. The following four documents are required:

- A. Documentation that the student with a disability graduated from secondary education;
- B. Documentation that the student with a disability has been accepted into a post-secondary education institution/program;
- C. Documentation of the student with a disability intention or confirmation that they had accepted the invitation to enter the post-secondary program; and
- D. Documentation that the student with a disability has been informed by the institution that their "seat" or "spot" is being held for them.

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If the student is determined to meet the definition of a student with a disability while in high school and continues to meet the recognized education program and age requirements no further disability documentation is required for the provision of pre-employment transition services.

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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 3 Processing Requests for Services and Information Release for Potentially Eligible Students

Students with disabilities may request pre-employment transition services directly or be referred by the Local Education Agency (LEA). RS will not implement any arbitrary age or time frame limit on when a student with a disability ([Section 7.2](#)) can submit a [Request for Services and Information Release](#). Pre-ETS may begin once a student with a disability requests or is recommended for one or more pre-employment transition services. RS will coordinate with the student, the student's parent/guardian, the LEAs and the student's IEP team, if applicable, regarding initiation of and provision of services.

A student with a disability may choose to receive Pre-ETS as a potentially eligible student with a disability, or they may choose to apply for VR services, be determined eligible, and receive Pre-ETS in accordance with an approved IPE. Students referred for Pre-ETS who are potentially eligible will need to complete a Request for Services and Information Release. The Request for Services and Information Release may be faxed, emailed if encrypted to protect confidentiality, or mailed to the Pre-ETS Transition Specialist. Pre-ETS Transition Specialists may also receive Requests for Services and Information Release at meetings with school personnel or families. A student with a disability, their parents, legal representatives, or guardians may also request pre-employment transition services directly.

All Requests for Services and Information Release shall be date stamped when the documents are first received by any part of Department for Children and Families (DCF).

The adult student or parent/guardian must sign the Request for Services and Information Release. If Pre-ETS staff receive a Request for Services and Information Release signed by a parent/guardian/adult student without signature verification of the student's disability from the school official, the Pre-ETS Transition Specialist is required to contact the school official regarding options for next steps in order to obtain verification of the student's disability. The school official can email verification of the disability through the school designated email in lieu of the school official signature on the Request for Services and Information Release. In circumstances where the school official does not sign the verification on the Request for Services and Information Release, it would be required to have disability documentation (IEP, 504, SSA award letter or other medical records).

If the parent/guardian/adult student and school official has completed and signed the Request for Services and Information Release, then the Pre-ETS Transition Specialist should proceed with verification that the individual meets the definition of a student with a disability ([Section 7.2](#)). The Pre-ETS Transition Specialist is required to review the Request for Services and Information Release, as well as any additional supporting documentation verifying the student's disability. If information was provided but it is not sufficient to verify that the individual meets the definition of a student with a disability, then the Pre-ETS Transition Specialist will ask for documentation to review from the student/parent/guardian or school.

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If the student does not meet the definition of a student with a disability, the Pre-ETS Transition Specialist will notify the parent/guardian (if applicable), student, and school (if referred and have an ROI) by phone and letter with the reason with their appeal rights.

The student can request to have a representative for their case. If the student is 18 or older and is their own guardian and wants the Pre-ETS Transition Specialist to share case information with parent/guardian or others, get the required [release of information form](#) signed. If the student is 18 years of age or older and has a guardian or representative, the Pre-ETS Transition Specialist will obtain pertinent guardianship or other documentation for the file.

## **Procedure for Processing Request for Services and Information Release, completing verification, and scheduling appointment:**

- If a Pre-ETS Transition Specialist receives a Request for Services and Information Release in person or through other means, the Pre-ETS Transition Specialist shall enter the information into the KMIS database as soon as possible, but no more than seven calendar days from the date DCF received the Request for Services and Information Release. In these circumstances, the Pre-ETS Transition Specialist will assign such cases on KMIS to themselves.
- The Pre-ETS Transition Specialist will contact the student and parent/guardian (if applicable) as soon as possible, but no more than seven calendar days from receiving the Request for Services and Information Release to schedule an appointment and send a letter confirming receipt of Request for Services and Information Release, appointment date, next steps, appeal rights and additional Pre-ETS information.
- The Pre-ETS Transition Specialist will contact the school official regarding next steps as soon as possible but no more than seven calendar days from the Request for Services and Information Release date received.
- The Pre-ETS Transition Specialist will complete the verification as soon as possible but no more than 15 calendar days from the Request for Services and Information Release date received if verification was completed by school official.
- The Pre-ETS Transition Specialist will complete the verification as soon as possible but no more than 30 calendar days from the Request for Services and Information Release date received if no verification was completed by school official or received with the Request for Services and Information Release.
- The Pre-ETS Transition Specialist will notify student, parent/guardian, and school (if referred and have an ROI) if the student does not meet the definition of a student with a disability and is not able to participate in Pre-ETS by phone and letter/email with the reason and appeal rights as soon as possible, but no more than seven calendar days from the verification date.
- The Pre-ETS Transition Specialist will schedule an appointment as soon as possible but no more than 30 calendar days from the verification date to begin providing services unless the student's schedule does not permit. The reason needs to be documented in the narrative. The appointment location may be at the school, DCF office, virtual platform, telephone, or public setting.
- The Pre-ETS Transition Specialist will maintain their outlook calendar to include detailed appointment information identifying the dates, times, name of the student(s), and location of where they will be working.
- Contact in the policy means to attempt by phone to reach the student or parent/guardian if applicable before just sending a letter or email.

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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 4 Pre-ETS Agreement and Scope of Available Services

To begin the process of developing a [Pre-ETS Agreement](#) of services to be provided, the Pre-ETS Transition Specialist will complete the [initial interview](#) and [Pre-Assessment Form](#) with the student and parent/guardian (if applicable). The Pre-ETS Transition Specialist is required to obtain an IEP, 504, or medical documentation to assist with the justification of needs. The narrative is required to reflect the justification of needs for Pre-ETS by using the disability documentation (IEP, 504, or medical documentation), pre-assessment, initial interview, and discussions with teachers/parents if applicable.

The student with the assistance of Pre-ETS Transition Specialist, parent/guardian or teacher completes the required Pre-Assessment Form. The Pre-Assessment is required for each student. This will assist the Pre-ETS Transition Specialist to determine what services the student needs and the progress the student makes. The Pre-ETS Transition Specialist will record this process as a self-advocacy activity for a required service.

The Pre-ETS Transition Specialist must follow the instructions below:

- Complete and/or review the Pre-Assessment Form with the student (use the assistance of parent/teacher if applicable).
- Enter a narrative on the R drive that the Pre-Assessment is complete, as soon as possible, but no longer than 30 calendar days from the date of verification that the student meets the definition of a student with a disability.
- Work with the student and parent/guardian (if applicable) to complete the Pre-ETS Agreement to identify the five required Pre-ETS activities the student needs (see below).
- Once the required service activity is complete, complete the form again as the [post-assessment](#) with the student to discuss the skills that were acquired, how to develop them further and/or how to apply them in a work setting and in their daily life.
- Answer only the questions that correspond with Pre-ETS content areas included in the required service activity.
- File a copy of the completed forms (Pre and Post Assessment) in the student's paper case file and document in the narrative the completion of the form.

#### Pre-ETS Agreement

The Pre-ETS Transition Specialist will work with the student and parent/guardian (if applicable) to develop the Pre-ETS Agreement. The Pre-ETS Agreement identifies the services to be provided, participation responsibilities, and expectations. The Pre-ETS Agreement shall be written, signed, and finalized in KMIS as soon as possible, but no more than 30 calendar days from verification. The Pre-ETS Agreement narrative and services should reflect informed choice by the student, documentation of needs the student has based on records (IEP, 504 plan, or medical records), and needs expressed by other parties if applicable (parent/guardian, teachers, etc.) through the Pre-Assessment and interviews as stated above. The Pre-ETS Transition Specialist must discuss VR services at the time of the Pre-ETS Agreement. If the student would like to be referred to VR Services, the Pre-ETS Transition Specialist must complete a referral or coordination meeting as soon as possible, but no more than 30 days from the date the student desired. The Pre-ETS Agreement needs to include

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evaluation criteria on how and when the student's progress will be evaluated. A copy of this Pre-ETS Agreement is required to be mailed to parent/guardian and/or adult student. The Pre-ETS Agreement is not required to be signed by a parent or legal guardian. The Pre-ETS Agreement is not required to be updated annually unless services are needed to be added. The Pre-ETS Agreement amendment shall be written, signed, and participation responsibilities and expectations. The Pre-ETS Transition Specialist is required to do an annual review with the student documenting in their narrative the student's progress, 5 required services, informed choice and student still meets verification.

## Available services

RS offers the 5 required pre-employment transition services to eligible or potentially eligible students with disabilities who need such services that are listed below. Pre-ETS will be provided to each student, depending on their needs, interests and informed choice. Pre-ETS may be provided in an individual setting or in group settings. All individuals must meet the definition of a student with a disability before services can be provided.

- The intent of **Job Exploration Counseling** is guided career exploration that will enhance opportunities for meaningful interaction, engagement, and self-reflection as the student participates in activities leading to a greater awareness of various career and employment opportunities.

Job Exploration Counseling includes the following topical content areas:

- Vocational/career interest inventories/self-assessments
- Local labor markets
- In-demand industries and occupations
- Non-traditional employment options
- Career pathways of interest to the student

Job Exploration Counseling activities may be done individually, virtually, or in a group setting, and include, but are not limited to:

- Provide or arrange for student participation in career fairs, expos, and campus visits. Events can highlight a specific career cluster or include business and industry professionals from a variety of sectors.
- Coordinate opportunities for visitors/speakers, role models and mentors to meet with students either in-person or virtually to describe their work, post-secondary education and training, early interests in careers, and personal information that informed their career decisions.
- Explore military career pathways.
- Instruct students on how to use both local and national labor market information to explore in-demand occupations and help inform/support career goals.
- Explore career pathways with multiple on-off ramps, and industry recognized credentials/certifications.
- Assist the student in learning about skills, academic/training requirements, and any physical or environmental demands required for employment in various career fields.
- Explore how assistive technology, and other types of accommodations can be utilized in various employment settings or career fields.

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- Access websites and print information offering self-assessments, career information, employment, and training information.
- **Instruction in Self-Advocacy** helps students learn about their rights and responsibilities; how to communicate their thoughts, concerns, and needs; understand how to express information about their disability and how it impacts them; and how to request accommodations, services, supports, and assistive technology that may be needed in the workplace or a post-secondary educational training program.

Instruction in Self-Advocacy may include:

- Person -centered planning is an on-going problem-solving process used to help students with disabilities plan for their future.
- Peer mentoring is a process through which a more experienced individual who shares some common characteristics, attributes or circumstances, encourages and assists a less experienced individual in acquiring skills, knowledge and attitudes to be more successful. Mentoring relationships can keep students with disabilities in school, contribute to positive self-esteem, and identify realistic career and academic goals.

Instruction in Self-Advocacy activities may be done individually, virtually, or in a group setting, and include, but are not limited to:

- Offer lessons that teach specific workplace self-advocacy skills including how to request and accept help in understanding job tasks, work schedule, employer benefits, submitting sick or vacation leave requests, making appointments, etc.
  - Offer lessons on disability disclosure, how to advocate for their rights and responsibilities, and use role playing activities to allow student to practice.
  - Encourage and support students to lead their own IEP meeting. Identify existing resources to teach the student to lead the meeting.
  - Offer lessons on decision-making (including supported decision-making), and opportunities for students to learn goal setting and attainment, and practice problem-solving.
  - Instruct students on how to identify support needs, explore websites such as the Job Accommodation Network, and request and utilize accommodations and/or modifications in a variety of settings.
  - Provide opportunities for students to participate in youth leadership activities in educational or community settings to help them learn and demonstrate independence, leadership skills, assertiveness, listen to others' opinions, and evaluate options.
  - Assist students in finding opportunities to learn about voting and other civic duties and privileges (i.e., such as connecting students with their local Center for Independent Living (CIL).
- The intent of **Work-Based Learning Experiences** is to strengthen opportunities for students, including those with the most significant disabilities to practice and improve workplace skills in competitive integrated work settings before exiting secondary education, and throughout post-secondary training, when applicable.

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Some of the different types of work-based learning experience activities that may be provided in a generalized manner are in a classroom setting, in the community on a worksite, and/or tailored to an individual's needs, include, but are not limited to:

- Job shadowing
- Practicum
- Service learning
- Career mentorship
- Informational interviews
- Workplace tours/field trips
- Volunteering
- Student-led enterprises
- Internships (paid and unpaid)
- Paid and non-paid work experiences

“Meaningful” work-based learning experiences include the following characteristics:

- Community, businesses and direct employers are actively engaged in the student's learning.
- VR business specialists, career and technical education personnel, and workforce providers share their expertise and resources to help design local level programs.
- The local education agency (LEA) and Vocational Rehabilitation coordinate and collaborate in the development of work-based learning opportunities to ensure they either expand or enhance in-school, after school, or summer work experience opportunities already provided under IDEA transition services.
- Include opportunities for students to gain work experience in diverse career pathways, leading to more meaningful post-secondary employment and training goals in the IEP/IPE.
- Pay students competitive wages for work performed during an employment experience.
- Focus on assisting students in developing broad, transferable skills that will lead to competitive integrated employment.
- Incorporates on-site supports and any general assistive technology needs of a student.
- Incorporates multiple, layered work-based learning experiences for students, not just one and done.
- Requires in-depth engagement of youth and an evaluation of acquired work relevant skills.
- Includes opportunities for student self-reflection and documentation of the student's performance/progress.
- Incorporates family engagement, and early communication with parents about the benefits of work-based learning
- All parties involved in the work experience are provided with information regarding each other's roles/responsibilities, transportation, liability, and student safety.

Prior to participating in a paid work-based learning experience the following need to be addressed: any supports or accommodations, ability to get to/from worksite, signed [paid-worked based learning experience agreement](#), ability to participate in the experience after

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school hours/summer, and ability to have necessary documentation of legal status to work in the United States and ability to complete all required paperwork through the staffing agency.

A student who has been terminated or fired from a paid work-based learning experience may not be able continue to participate in the experience. This would be determined by Pre-ETS Transition Manager on a case-by-case basis. The student will be able to continue to receive other available services if they continue to meet the criteria to participate in Pre-ETS. Refer to the service descriptions for more specific information on the paid work-based learning experience. The forms for the paid work based learning experience and student compensation are located in the [forms site](#). The Pre-ETS Transition Specialist must ensure that required staffing and onboarding paperwork for the paid work-based learning experience is completed and documented in the narrative.

- **Workplace Readiness Training** includes programming to help students with disabilities develop social and independent living skills, such as communication and interpersonal skills, financial literacy, orientation and mobility skills, job seeking skills, understanding employer expectations for punctuality and performance, as well as other employability skills. These services may include instruction, as well as activities that provide students opportunities to practice, and acquire/apply knowledge.

Workplace readiness training activities may be provided in a generalized manner in a classroom setting or tailored to an individual's needs, and include, but are not limited to:

## **Activities that identify social/interpersonal skills and behaviors necessary for any job.**

- Opportunities for students to learn how to communicate effectively on the job (e.g., verbal, written, other communication devices), understand the importance of body language, acting professionally and interacting appropriately with supervisors and co-workers.
- Engage students in activities that support teamwork, cooperation, active listening, good manners, and use role playing activities to allow the student to practice.
- Provide opportunities for students to practice problem-solving skills, adaptability/flexibility through various workplace scenarios.
- Identify behaviors that reflect a positive work ethic, and practice through role-playing activities.

## **Activities that focus on job-seeking skills.**

- Work with the student to create a resume and/or portfolio to highlight their strengths.
- Practice filling out on-line job applications, and provide opportunities for students to upload resumes, cover letters, transcripts, or other documents.
- Help students prepare a "cheat sheet" with key information they can use to conduct a professional job search.
- Conduct mock interviews with real employers to help students practice job interviewing skills.

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## **Activities that highlight basic independent living skills a student needs to do on a daily basis to live an independent life.**

- Opportunities for students to learn and practice personal care (dressing, grooming, and hygiene), food preparation, clothing management (laundry, sorting, identification), personal organization, and household maintenance.
  - Identify resources to teach students money management, benefits planning (if appropriate), and general financial literacy.
  - Develop targeted activities to promote independence at work such as time management, moving from task to task, and self-monitoring production and performance.
  - Identify and practice using various modes of transportation to get to and from work or navigate effectively in their local community.
  - Teach orientation and mobility skills training, when appropriate.
  - Opportunities for students to practice using basic technology devices (e.g., phones, iPads, laptops, apps).
- **Counseling on Opportunities for Enrollment in Comprehensive Transition or Post-Secondary Educational Programs at Institutions of Higher Education (IHE)** is information on course offerings, career options, the types of academic and occupational training needed to succeed in the workplace, and postsecondary opportunities associated with career fields or pathways.
    - Advising students and parents or guardians on academic curricula college application and admissions processes.
    - Completing the Free Application for Federal Student Aid (FAFSA).
    - Resources that may be used to support individual student success in education and training which could include disability support services.

Examples of specific activities may that be done individually, virtually, or in a group setting, include, but are not limited to:

- Plan and arrange visits to local post-secondary education campuses.
- Opportunities for students to participate in events at local college campuses.
- Review/discuss:
  - Examples of college applications
  - Scholarship and grant applications
  - Accommodations for college entrance testing, SAT/ACT
- Offer lessons on financial planning and budgeting for college.
- Research financial aid opportunities such as Pell grants, ABLE (Achieving a Better Life Experience) accounts, and PASS (Plan to Achieve Self-Support) plans.
- Educate students on differences between high school and college/post-secondary training programs.
- Invite recent HS graduates to talk about their experiences transitioning to college.
- Counsel students regarding the importance of networks of support, independent living options and community participation in relation to participating in post-secondary education opportunities.

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- Educate students about accommodations and resources available at college disability service offices.

## [34 CFR 361.48\(a\)\(2\)](#)

In addition, Pre-ETS funds may be used for the provision of auxiliary aids and services for eligible or potentially eligible students with disabilities with sensory and communicative disorders who require such services to access Pre-ETS. Auxiliary aids and services ensure equal access to information, materials, services, and activities available to students with disabilities participating in Pre-ETS. *Provision of auxiliary aids and services under Pre-ETS requires the prior approval of the Pre-ETS Program Administrator.*

The following are examples of what is allowed and not allowed with Pre-ETS funding. These examples are not an exhaustive list, consult with your Pre-ETS Transition Manager for questions.

**Example 1: Allowed with Pre-ETS funds** — For example, screen reading software programs could be purchased to enable an individual who is blind to access information on a computer during a work-based learning experience. It is important to note that the screen reader software for individuals who are blind or visually impaired, not the computer on which it is installed, meets the definition of “auxiliary aids and services.”

**Example 2: Allowed with Pre-ETS funds** —for an individual who is deaf, sign language interpreter services or video-based telecommunication products could be purchased to ensure access to information in activities related to job exploration counseling or other Pre-ETS.

**Example 3: Not Allowed with Pre-ETS funds** —personal devices and services do not meet the definition of auxiliary aids and services. Personal devices and services include individually prescribed devices, such as prescription eyeglasses or hearing aids, readers for personal use or study, or services of a personal nature. If a student with a disability requires personal devices or services or individually prescribed assistive technology, RS must work with the student to determine whether they meet the eligibility criteria of vocational rehabilitation services. Such services may be provided in accordance with an approved IPE.

**Example 4: Not Allowed without a VR IPE** — In addition, other services which cannot be funded without a VR IPE, but may be determined necessary for the student to effectively participate in pre-employment transition services. Such services may include job coaching, clothing for work-based learning experiences, or transportation. In such cases, if the student is eligible for VR, then an IPE should be developed to include these additional services and reported as a Pre-ETS expenditure.

As a result (as in Examples 3 and 4), the student may have both Pre-ETS case file and VR services case open at the same time in order to coordinate the provision of necessary services.

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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 5 Service Codes (Pre-ETS only) and Spending Authorities

As part of the RS fiscal accountability standards, each Pre-ETS Transition Specialist has a spending authority which permits them to independently authorize and pay for services *within the specified authority*. Authorizations that exceed the Pre-ETS Transition Specialist's authority must receive additional approval through the exceptions process.

To request such approval, the Pre-ETS Transition Specialist completes an [exception form](#) indicating the justification on why the service is necessary and required.

- The Pre-ETS Transition Manager reviews such requests. The Pre-ETS Transition Manager has authority to approve \$500 dollars more than the Pre-ETS Transition Specialist spending authority. In the event that the Pre-ETS Transition Manager is absent or not available the RS Program Administrator has the authority to approve \$500 dollars over the Pre-ETS Transition Specialist spending authority.
- If the request is above the Pre-ETS Transition Manager's spending authority, then it is sent to the Statewide Pre-ETS Program Administrator for approval.

Exceptions may be approved or denied. Documentation of exception decisions must be maintained in the case file. Copies of approved exception forms must be provided to the Pre-ETS Transition Specialist, Pre-ETS Transition Manager, RS Program Administrator and the Statewide Pre-ETS Program Administrator.

In the table below, TS SA refers to the "Pre-ETS Transition Specialist's Spending Authority," meaning that the total amount expended for any given service over the entire time the case is open may not exceed the stated spending authority unless an exception is approved in advance. PA refers to "per authorization," meaning that any one authorization may not exceed the stated spending authority although there may be multiple authorizations made during the case.

In the table below service provider agreement is referenced, review the [service descriptions](#) for more information.

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<b>Service Code</b>	<b>Unit</b>	<b>Examples</b>	<b>Pre-ETS Transition Specialist spending authority (TS SA)</b>
<b>450</b> Job exploration counseling	Each	Provided by Pre-ETS Service Provider Agreement	\$500 TS SA
<b>451</b> Instruction in self-advocacy	Each	Provided by Pre-ETS Service Provider Agreement	\$500 TS SA
<b>452</b> Workplace readiness training	Each	Provided by Pre-ETS Service Provider Agreement	\$600 TS SA
<b>453</b> Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education	Each	Provided by Pre-ETS Service Provider Agreement	\$500 TS SA
<b>454</b> Work-based learning experiences	Hour	Provided by Pre-ETS Service Provider Agreement	\$1,200 TS SA
<b>455</b> Work-based learning experiences student wages	Hour	(temporary employment agency contracted by RS to provide payroll services and workers compensation coverage)	\$4,896 TS SA
<b>456</b> Work-based learning experiences successful completion	Each	Service Provider Agreement	\$2,118 TS SA

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<p><b>457</b> Auxiliary aids and services for students who are deaf or hard of hearing Hourly fee not to exceed \$52 for level IV and V level certification without exception approval through administration office for interpreters not on state contract.  Rate for note takers: Current minimum wage and not to exceed 30 hours per week. (Service is only available when necessary to participate in the pre-employment transition services)</p>	<p>Hour</p>	<p>Qualified interpreters on-site or through video remote interpreting (VRI) services</p>	<p>\$3,000 TS SA <a href="#">State Contract use</a></p>
<p><b>458</b> Travel Time for Sign Language Interpreters (Service is only available when necessary to participate in the pre-employment transition services)</p>	<p>Hour</p>	<p>Hourly professional fee for travel time. This service requires approval from the Administration Office. Mileage would be Service Code 459</p>	<p>\$150 PA</p>

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<p><b>459</b> Mileage for Sign Language Interpreters Rate: The mileage rate will be indexed to 65% of the State of Kansas official mileage rate as published by the Department of Administration each July. In accordance with the current (July 1, 2023) Kansas Department of Administration mileage rate, the mileage rate is 43 cents per mile. Remember: Mileage must be based on an estimate of actual miles necessary to carry out the service, and not a lump sum or “stipend” amount on the service description. Mileage may be paid door-to-door, sometimes referred to as portal-to-portal. Currently vendor mileage must be entered into a KMIS vendor table before it can be authorized. The payment authorization must include mileage log with the actual miles. (Service is only available when necessary to participate in the pre-employment transition services)</p>	<p>Mile</p>	<p>Mileage for Sign Language Interpreters <a href="#">Refer to Section 3.14</a></p>	<p>\$200 PA</p>
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<p><b>460</b> Auxiliary aids for students who are deaf or hard of hearing (Service is only available when necessary to participate in the pre-employment transition services)</p>	<p>Each</p>	<p>Note takers; real-time computer-aided transcription services; written materials; exchange of written notes; telephone handset amplifiers; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning, including real-time captioning; voice, text, and video-based telecommunications products and systems, including text telephones (TTYs), videophones, and captioned telephones, or equally effective telecommunications devices; videotext displays; accessible electronic and information technology; or other effective methods of making aurally delivered information available to individuals who are deaf or hard of hearing; acquisition or modification of equipment or devices; and other similar services and actions</p>	<p>\$250 TS SA</p>
<p><b>461</b> Auxiliary aids and services for students who are blind or visually impaired (Service is only available when necessary to participate in the pre-employment transition services)</p>	<p>Each</p>	<p>Qualified readers; taped texts; audio recordings; Braille materials; optical readers; secondary auditory programs (SAP); large print materials; or other effective methods of making visually delivered materials available to students who are blind or have low vision; acquisition or modification of equipment or devices; and other similar services and actions</p>	<p>\$500 TS SA</p>
<p><b>462</b> Empower Me Workshop</p>	<p>Each</p>	<p>Service Provider Agreement</p>	<p>\$424 TS SA</p>

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<b>463</b> IEP Meeting	N/A	Provided in-house by Pre-ETS	None
<b>464</b> VR Collaboration Meeting	N/A	Provided in-house by Pre-ETS	None
<b>465</b> DCF Foster Care/Independent Living Collaboration Meeting	N/A	Provided in-house by Pre-ETS	None

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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 6 Fiscal Accountability and Authorization of Services

#### Synopsis of federal requirements

Rehabilitation Services (RS) must employ methods of administration to assure the proper and efficient implementation of the program. These methods must include procedures to ensure accurate data collection and financial accountability.

#### [34 CFR 361.12](#)

As a state agency, Pre-ETS must expend and account for public funds in accordance with state and federal laws and procedures. Fiscal control and accounting procedures must permit the tracing of funds to a level of expenditures adequate to establish that such funds were spent in accordance with federal requirements and that there have been no violations related to restricted or prohibited uses of funds based on applicable laws.

*Reference:* [§ 200.302](#)

RS must have sufficient fiscal controls in order to track specific expenditures and assure that the expenditures were made only for the allowable purposes authorized for the Pre-ETS program. Costs paid for from the Pre-ETS reserve funds authorized and supported by original receipts, bank records, lease or rental agreements or other documentation.

*Reference:* [Rehabilitation Services Administration 2012 Monitoring Report](#)

#### Authorizing the Required Services

All services to be provided for students must be authorized in advance and paid through the Kansas Management Information System (KMIS). KMIS tracks all service authorizations (obligations) and payments.

All services must be authorized before they are provided in order to be paid for from the Pre-ETS reserve funds. This action is accomplished by completing a Service Authorization on KMIS. The prior written Service Authorization must be issued before the service begins. Only Pre-ETS Transition Managers, Program Administrators, or assigned Administration Office personnel can finalize Service Authorizations.

When authorizing services, the Pre-ETS Transition Specialist must determine the appropriate payee and payment method.

#### [361.48\(a\)\(2\)](#)

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## Authorizations and payments to vendors

A Service Authorization (similar to a purchase order) is issued to the vendor for a specified good or service and at a specified cost. Upon completion of the service or delivery of the item, the vendor provides an invoice to Pre-ETS Transition Specialist for payment.

Vendors include:

- Service providers for whom payment rates are established through provider agreement.
- Vendors who sell specified goods and services. If an item is available through a state contract, the contract must be used for the purchase unless a waiver (prior authorization) is provided in advance by DCF Procurement.

Procedures related to vendor authorizations and payments

- The vendor must be willing to accept the Service Authorization from Pre-ETS Transition Specialist and invoice the Pre-ETS Transition Specialist for the good upon delivery or the service upon completion.
- The vendor must have a W-9 form on file with the state's accounting system.
- A Service Authorization identifying the services, goods, or supports must be sent in advance to the vendor prior to services beginning.
- All purchases are exempt from Kansas state and local sales tax. A copy of the [tax exempt certificate](#) is available.
- Upon receipt of the invoice, payments need to be made as soon as possible, but no more than 30 calendar days.
- A [materials received document](#) must be completed by the student and Pre-ETS Transition Specialist for equipment purchased, and the form must be maintained in the case file.
- Vendor reports for services provided, as specified in the Service Descriptions, must be maintained in the case file. These reports are supporting documentation that the funds were used for the purpose specified and as allowed by applicable statutes.

## Provider Information

For each service received by the student, enter the following provider information.

Indicate which of the following pertain to the service:

- Provided directly by Pre-ETS staff.
- Purchased as authorized by Pre-ETS staff. If yes, select one of the following options:
  - Community Rehabilitation Programs (CRPs): Public CRPs are programs that are operated by a State, county, municipal or other local government. These include community service providers affiliated with Community Developmental Disability Organizations and Community Mental Health Centers.
  - Private CRP: Private CRPs are programs that are operated as not-for-profit organizations. *This category includes **KANSASWORKS**.*
  - Public Service Provider: Public service providers are organizations or agencies of State, county, municipal or other local governments.
  - Other Private Service Provider: Private service providers include private not-for-profit organizations, such as VR service providers, proprietary businesses: such as private hospitals and mental health clinics, and contracted service delivery staff. *This category*

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*includes KYEA, Centers for Independent Living and Staffing Agency. This category also includes sign language interpreters.*

## Payment procedures

Payments for items on a Service Authorization are created by Pre-ETS field staff. The Payment Authorization may be approved only by the Pre-ETS Transition Manager, Program Administrator or Statewide Pre-ETS Program Administrator. Every attempt will be made to process payments within 72 hours of receiving the invoice. Payments must be completed within 30 days from the day equipment was received by the student or Pre-ETS Transition Specialist or the day the invoice is received in the field office (whichever date is later), according to the Kansas Prompt Payment Act. Normally allow seven to 10 days for a payment to be processed so that the warrant will be dated by the 30th day.

Outstanding service authorizations must be monitored. Payments after the authorization expiration date will not be permitted because of federal "period of performance" requirements. KMIS will auto date all new authorizations with a one-year expiration date. If an authorization expires and the service is still needed a new authorization must be created. **You are required to send the vendor a cancellation notice of the expired authorization.**

**You are only able to unauthorize the service authorization if you have not finalized the service authorization. If you are needing to cancel the authorization, you are required to do the following steps.**

- It is essential to call/email to speak with the provider/vendor to let them know and ensure there are no pending bills associated with that authorization.
- Send the cancellation notice to them.
- Send to your Pre-ETS Transition Manager to cancel the authorization on KMIS.
- Narrate your conversation once cancellation notice is sent, include person you spoke with, and authorization numbers that you cancelled on the date that it occurred.
- Staple the authorizations and cancellation notice together and put in case file.

## Fiscal documents

For each purchase, all the associated authorizations and documentation should be grouped together for filing in the case file. Authorizations and documentation to be grouped should include but not limited to the following, as applicable to the specific purchase: the service authorization, payment authorization, invoices, equipment loan forms and receipts/purchase documentation.

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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 7 Case File Documentation and Narrative

Documentation is intended to meet, but not exceed, the federal requirements for records of service. Pre-ETS staff will exercise professional judgment and discretion in determining the nature, scope and extent of relevant information to be included in the record. Information should be limited to that which is necessary and sufficient to show the basis and justification for verification decisions, service decisions and the expenditure of public funds.

The Pre-ETS Agreement should be written with sufficient detail to avoid any misunderstanding about services and responsibilities.

Duplicate and extraneous materials do not need to be kept in the record. Documentation of a decision should be sufficient to show that the decision is reasonable, based on adequate fact and information, correctly applies policy, and that the student participated in the decision.

Generally, case narratives should address:

- What occurred: (decision made, student reported progress, student progress and outcomes during the session, discussions of required services, information requested, each student contact, attempted student contacts, other party contacts (guardians, agencies, providers, employers), etc.)
- An explanation of what occurred, if needed.
- A description of the student's involvement in what occurred.
- A brief notation of the next step.

Case narratives are necessary only for information that cannot be found in other records.

#### Documentation guide

When viewed as a whole, the case file (record of services) should reflect:

- The quality and substantiality of the services provided by Pre-ETS.
- Evidence of the student's full involvement and participation in the available services.
- Maintenance of appropriate and timely contact with the student, with no undue or unwarranted delays.
- Timeliness of services provided with no undue or unwarranted delays. The case file should show evidence that Pre-ETS Staff responded to students in a timely way.
- That the overall case shows an emphasis on helping the student gain employment skills.

Case narrative entries should be dated and include the Pre-ETS Transition Specialist's initials. If other staff add to the narrative, they should sign their full names.

Care should be taken to assure that other student names are not inadvertently placed in a service record. For example, if multiple student names appear on an e-mail message to be filed in the service record, black out all names/information that do not relate to the specific student.

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Progress notes from vendors (contractors/service providers) need to clearly identify the vendor as the source.

Any letters or documents that are mailed need to have a date mailed noted on the document that was mailed to the student, parent/guardian, school, provider, etc. The case file narrative also needs to record the letter or document being sent and the date.

The Pre-ETS Transition Specialist can send letters through email if the student, parent, or other party has identified they would like to receive the letter in that format and document the conversation in the case narrative.

All case narratives must be maintained on the regional shared drive.

## **Case file organization**

The information filed in the service record should be organized as follows:

Left section:

- Signed and date stamped Request for Services and Information Release
- Signed and dated Pre-ETS Agreement and Pre-ETS Agreement Amendments
- Verification documentation

Right section:

- Student history (KMIS printout)
- Inactive letter
- KMIS printout of closure screens (after implementation of revised screens)
- Case narrative
- Required Services (KMIS printouts)
- Initial Interview
- Pre and Post Assessments
- Service provider reports
- Correspondence, such as letters, emails
- Release of information forms
- Authorization and payment records

Pre-ETS Transition Specialists have the flexibility to divide each section described above into two parts for ease of handling of lengthy case files.

Information in the case file should be in chronological order, with the most recent information on top.

Every effort should be taken to keep the file folder free of duplicate and unnecessary information.

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## Frequency of Contact

Frequency of contact should be determined by the individual circumstances; however, monthly contact is required and must be documented in the narratives. Examples of a form of contact would be phone call to the student, email to the student (if appropriate), letter and/or face-to-face meetings with the student. The form of contact should be based on the student's preference of contact. The Pre-ETS Transition Specialist is to provide services face-to-face to the student at least every other month to continue to make progress learning and developing the pre-employment skills through the required services. If services are interrupted or there is a loss of contact, the reasons must be entered in the case narrative. The narratives should also reflect what efforts are being taken to resume services. The Pre-ETS Transition Specialist shall use all methods available from the information that was provided: phone, address, email address, school contact, DCF programs, etc.

## Progress notes

Documentation must include identification of student's progress, and interventions or action plans used to address issues or concerns, if any. Progress notes may be found in Pre-ETS Transition Specialist's narratives or in reports from service providers.

## Records retention

Service records will be retained for five years after the closure of the case. At each calendar year, the Administration Office will send the Field Office Records Retention Officers a list of cases closed during that period. These lists should be retained for future reference in determining which files can be destroyed.

At the end of each calendar year, the Field Office Records Retention Officers should prepare a list of records they intend to destroy. This list will be sent to the RS Administration Retention Officer for approval prior to destroying any records.

## Pre-ETS KMIS Case Status Codes

Case status codes are used to assure consistency in tracking a student's status in their Pre-ETS case. Case status changes will be automatically recorded in KMIS.

01	Request for Services and Information Release not completed
02	Request for services and Information Release Completed
03	Verification
04	Pre-ETS Agreement
05	Services being provided
12	Follow up (inactive 02,03,04 and follow up required)
14	Inactive (no services provided)
15	Discontinuation

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## Specific guidelines for entering Pre-ETS activities/contacts in KMIS

The Pre-ETS Transition Specialists will enter in Pre-ETS KMIS the following information for each required service they make with each student. The Pre-ETS Transition Specialist will also be required to have a more detailed narrative in their case notes of each contact and required service with the student maintained on regional R drive. The narratives must be entered into KMIS and regional R drive as soon as possible, but no later than 15 calendar days.

<b>Job exploration counseling Service Code: 450</b>	<b>Instruction</b>	<b>Examples</b>
Date	This is the date the service was provided.	05/12/2023
Group/Individual	Did this occur in a group or individual setting?	This was completed individually. This was completed in a group setting.
Activities	What was provided to the student?	Reviewed Kansas Career Navigator with student, researched CNA requirements, completed my next move interest inventory
Provider	This is who provided the service.	Pre-ETS Transition Specialist, workforce center, CIL
Activity location	Where did the activity take place?	DCF office, Ellis High School, Public Library
Progress	The progress that the student has made. This reflect and discuss the pre-assessment competencies.	The student has decided they are interested in being a certified nursing assistant. The student has met all the competencies in job exploration.
Next Steps	The next steps that Pre-ETS and student will be making.	Pre-ETS has scheduled a meeting for 6/12/2023 to work on training programs for CNA in post-secondary required service.

<b>Instruction on Self-Advocacy Service Code: 451</b>	<b>Instruction</b>	<b>Examples</b>
Date	This is the date the service was provided.	05/12/2023
Group/Individual	Did this occur in a group or individual setting?	This was completed individually. This was completed in a group setting.
Activities	What was provided to the student?	The student received self-advocacy from provider agreement. The Pre-ETS staff used the soaring materials from unit 1.
Provider	This is who provided the service.	Pre-ETS Transition Specialist, workforce center, CIL
Activity location	Where did the activity take place?	DCF office, Ellis High School, Public Library, CIL
Progress	The progress that the student has made. This reflect and discuss the pre-post assessment competencies.	The student understands their disability and can clearly describe to others. The student has improved their level of proficiency to very good.
Next Steps	The next steps that Pre-ETS and student will be making.	Pre-ETS has scheduled a meeting for 6/12/2023 to continue to work on self-advocacy competency describing necessary accommodations for completing tasks.

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<b>Workplace readiness training Service Code: 452</b>	<b>Instruction</b>	<b>Examples</b>
Date	This is the date the service was provided.	05/12/2023
Group/Individual	Did this occur in a group or individual setting?	This was completed individually. This was completed in a group setting.
Activities	What was provided to the student?	The student attended a class through provider agreement for job preparation. The Pre-ETS Transition Specialist presented materials from unit 2 working on communication with employers.
Provider	This is who provided the service.	Pre-ETS Transition Specialist, workforce center, CIL
Activity location	Where did the activity take place?	DCF office, Ellis High School, Public Library, CIL, Workforce Center
Progress	The progress that the student has made. This reflect and discuss the pre-post assessment competencies.	The student has learned how to communicate with co-workers & supervisors. The student understands time management skills to how up to work on time. The student has improved their level of proficiency to very good on both competencies.
Next Steps	The next steps that Pre-ETS and student will be making.	Pre-ETS has scheduled a meeting for 6/12/2023 to continue to work on work-readiness skills.

<b>Counseling on opportunities for enrollment in comprehensive transition or postsecondary education programs Service Code: 453</b>	<b>Instruction</b>	<b>Examples</b>
Date	This is the date the service was provided.	05/12/2023
Group/Individual	Did this occur in a group or individual setting?	This was completed individually. This was completed in a group setting.
Activities	What was provided to the student?	The Pre-ETS staff discussed and connected them to the disability access office through the college campus. The Pre-ETS Transition Specialist and student discussed accommodations he/she would need in college.
Provider	This is who provided the service.	Pre-ETS Transition Specialist
Activity location	Where did the activity take place?	DCF office, Ellis High School, Public Library, CIL, Workforce Center
Progress	The progress that the student has made. This reflect and discuss the pre-post assessment competencies.	The student understands where to access disability services through the college. The student understands what accommodations they need for college. The student has improved their level of proficiency to very good on the competency.

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Next Steps	The next steps that Pre-ETS and student will be making.	Pre-ETS has scheduled a meeting for 6/12/2023 to continue to work on discussions in postsecondary education.
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<b>Work-Based Learning Experiences Service Code: 454</b>	<b>Instruction</b>	<b>Examples</b>
Date	This is the date the service was provided.	05/12/2023
Group/Individual	Did this occur in a group or individual setting?	This was completed individually. This was completed in a group setting.
Activities	What was provided to the student?	The student participated in a CNA job shadow. The student participated in paid work experience. The student participated in mock interview.
Hours	How many hours of paid work experience did the student work?	The student worked X number of hours during the paid work experience.
Provider	This is who provided the service.	Pre-ETS Transition Specialist, workforce center, CIL
Activity location	Where did the activity take place?	DCF office, Ellis High School, Public Library, employer site
Progress	The progress that the student has made. This reflect and discuss the pre-post assessment competencies.	The student has learned how to communicate during mock interview. The student has improved their level of proficiency to very good on this competency
Next Steps	The next steps that Pre-ETS and student will be making.	Pre-ETS has scheduled a meeting for 6/12/2023 with VR for a smooth transition.

<b>Empower Me Workshop Service Code: 462</b>	<b>Instruction</b>	<b>Examples</b>
Date	This is the date the service was provided.	05/12/2023
Group/Individual	Did this occur in a group or individual setting?	This was completed in a group setting.
Activities	What was provided to the student?	The student worked on self-advocacy, work-readiness, discussions on post-secondary training, and job exploration.
Provider	This is who provided the service.	KYEA
Activity location	Where did the activity take place?	DCF office, Ellis High School, Public Library, CIL, Workforce Center
Progress	The progress that the student has made. This reflect and discuss the pre-post assessment competencies.	The student learned self-advocacy skills, work-readiness skills, reviewed post-secondary training, and job exploration discussions. The Pre-ETS Transition Specialist will continue to work on these skills learning during the workshop
Next Steps	The next steps that Pre-ETS and student will be making.	Pre-ETS has scheduled a meeting for 6/12/2023 to continue working on Pre-ETS work readiness training.

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<b>IEP Meeting Service Code: 463</b>	<b>Instruction</b>	<b>Examples</b>
Date	This is the date the service was provided.	05/12/2023
Group/Individual	Did this occur in a group or individual setting?	This was completed in an individual setting.
Activities	What was provided to the student?	Pre-ETS attended the IEP meeting with the student and school personnel.
Provider	This is who provided the service.	Pre-ETS Transition Specialist
Activity location	Where did the activity take place?	Ellis High School
Progress	The progress that the student has made. This reflect and discuss the pre-post assessment competencies.	The student advocated their transition goals during the IEP.
Next Steps	The next steps that Pre-ETS and student will be making.	Pre-ETS has scheduled a meeting for 6/12/2023 to continue working on Pre-ETS work readiness training.

<b>VR Collaboration Meeting Service Code: 464</b>	<b>Instruction</b>	<b>Examples</b>
Date	This is the date the service was provided.	05/12/2023
Group/Individual	Did this occur in a group or individual setting?	This was completed in an individual setting.
Activities	What was provided to the student?	The student attended the meeting with the student and VR counselor.
Provider	This is who provided the service.	Pre-ETS Transition Specialist
Activity location	Where did the activity take place?	DCF office, Ellis High School, Public Library, CIL, Workforce Center
Progress	The progress that the student has made. This reflect and discuss the pre-post assessment competencies.	The student discussed the progress he has been making in Pre-ETS. He discussed their disability and advocated their needs during this meeting.
Next Steps	The next steps that Pre-ETS and student will be making.	Pre-ETS has scheduled a meeting for 6/12/2023 to continue working on Pre-ETS work readiness training.

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PART Case File Documentation and Narrative

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<b>DCF Foster Care/Independent Living Collaboration Meeting Service Code: 465</b>	<b>Instruction</b>	<b>Examples</b>
Date	This is the date the service was provided.	05/12/2023
Group/Individual	Did this occur in a group or individual setting?	This was completed in an individual setting.
Activities	What was provided to the student?	Pre-ETS and DCF FC/IL had a collaboration meeting with the student.
Provider	This is who provided the service.	Pre-ETS Transition Specialist
Activity location	Where did the activity take place?	DCF office, Ellis High School, Public Library, CIL, Workforce Center
Progress	The progress that the student has made. This reflect and discuss the pre-post assessment competencies.	The student and staff discussed the services and progress that had been provided to assist with ongoing services.
Next Steps	The next steps that Pre-ETS and student will be making.	Pre-ETS has scheduled a meeting for 6/12/2023 to continue working on Pre-ETS work readiness training.

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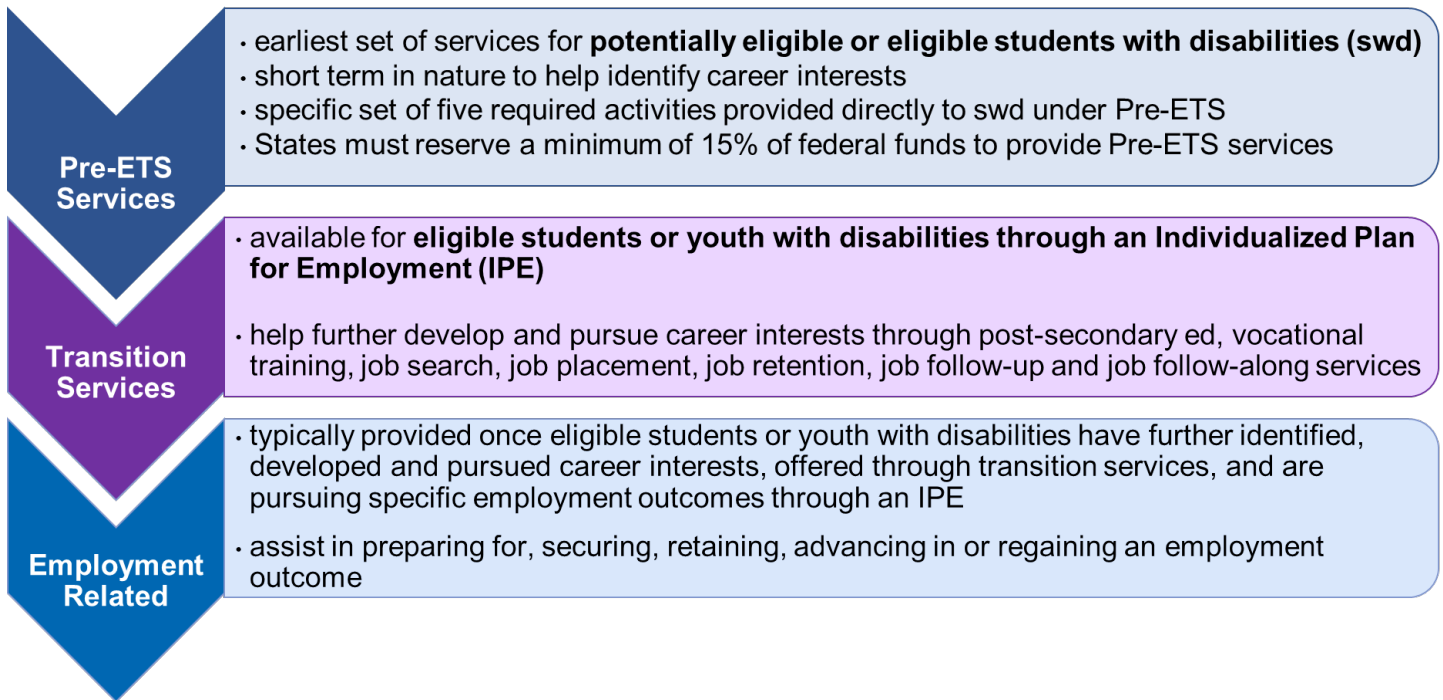
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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 8 Intra-Agency Collaboration

The [Rehabilitation Act of 1973, as amended through the Workforce Innovation and Opportunity Act](#), establishes a continuum of services to assist students and youth with disabilities in successfully transitioning from school to the adult world of work and independent living. This continuum includes:



Pre-employment transition services are the earliest set of services for students with disabilities who are eligible or potentially eligible for Vocational Rehabilitation (VR) services. Once a student with a disability has been determined eligible, and is able to be served, they may continue to receive pre-employment transition services, but these services must be provided in accordance with an approved IPE.

The full array of individualized VR services, including transition services and employment related services may be provided to an eligible student or youth with a disability in need of such services so long as they are included on an approved IPE to assist in preparing for, securing, retaining, advancing in or regaining an employment outcome that is consistent with the individual's unique strengths, resources, priorities, concerns, abilities, capabilities, interests, and informed choice.

It is important to note that any allowable VR service can be provided as a VR transition service under an IPE.

Coordination and collaboration are essential to assure a smooth transition and to optimize the individual's opportunity to achieve competitive integrated employment.

# Rehabilitation Services Policy Manual

SECTION Pre-Employment Transition Services (Pre-ETS)  
PART Intra-Agency Collaboration

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## Collaboration between Pre-ETS Transition Specialist and VR Counselor

If a potentially eligible student who is receiving pre-employment transition services need additional VR services, in order to participate in or benefit from one or more of the five required pre-employment transition services, the student must apply, and be determined eligible for VR services. Once the student has been determined eligible, any of the five required pre-employment transition services, as well as any additional VR services the student needs to participate in Pre-ETS must be provided in accordance with an IPE.

If additional VR services are necessary for the student to participate in or benefit from Pre-ETS, then the VR Counselor and Pre-ETS Transition Specialist will coordinate to:

- Facilitate the student's application for VR services.
- Gather documentation necessary for the VR Counselor to determine eligibility for VR services. The VR counselor will update the Pre-ETS Transition Specialist if the student is eligible or ineligible for VR services once it has been determined.
- In such cases, if the student is eligible for VR, then an Individual Plan for Employment (IPE) should be developed to include these additional services.
- Discuss development of the VR IPE to assure inclusion of necessary services.
- If the student is eligible and has an IPE, the VR Counselor will authorize necessary services and notify the student and Pre-ETS Transition Specialist.

As a result, the student may have both a Pre-ETS case file and VR services case open at the same time in order to coordinate the provision of necessary services. If a VR services case and Pre-ETS case file is open at the same time, the Pre-ETS Transition Specialist will keep the VR Counselor updated quarterly regarding the services the student is receiving in Pre-ETS. The Pre-ETS Transition Specialist and the VR counselor will collaborate and provide information on quarterly progress. This will be documented in the narrative. There may be situations when the student is participating in a paid work-based learning through Pre-ETS and receiving services through VR, such as job coaching, to support the work-based learning. In such situations the Pre-ETS Transition Specialist and VR Counselor need to discuss the case at least biweekly by phone, virtually, email or in person. If job coaching is a service that the VR counselor is providing for the paid work-based learning experience, then the Pre-ETS Transition Specialist should be involved with the conversations with the job coach provider. The VR counselor would complete the job coaching referral at the same time that the Pre-ETS Transition Specialist makes a referral for the paid work-based learning experience. The best practice would be VR Counselor, Pre-ETS Transition Specialist, Job coach provider, and Paid Work Based Learning Experience Service Provider all meet to discuss process and roles. The Pre-ETS Transition Specialist should be copied on all job coaching reports related to the paid work-based learning experience.

The following are categories for funding sources to help explain [the notice of interpretation](#) of the federal register rules and regulations that was public on February 28<sup>th</sup>, 2020 and finalized on March 21, 2022.

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## Seamless services

Coordination/collaboration between VR Counselors and Pre-ETS Transition Specialists is essential to assure that students with disabilities have access to the continuum of services they need to become employed and self-reliant. When coordinating services, it's important to follow these guidelines listed below for assignment of costs to the appropriate funding source.

## Category A – Pre-Employment Transition Services (Pre-ETS)

Funds set aside for (Pre-ETS) will be used to pay for the following required pre-employment transition services:

- Job exploration counseling.
- Instruction in-self-advocacy.
- Workplace readiness training.
- Counseling on opportunities for enrollment in comprehensive transition or post-secondary education programs.
- Work-based learning experiences.

Auxiliary aids and services can also be provided to potentially eligible or eligible students with disabilities with a sensory or communicative disability if necessary to access or participate in the five required pre-employment transition activities. The VR agency can pay for these aids or services with the pre-employment transition services reserve unless another public entity is required to provide them.

Auxiliary aids and services are described in the Americans with Disabilities Act.

Examples of auxiliary aids and services may include:

- Qualified sign language interpreters.
- Note-takers and readers.
- Assistive living devices.
- Videophones.
- Audio recordings.
- Braille materials and displays.
- Screen reader software.
- Magnification software.
- Large print materials.

The following auxiliary aids and services can be provided to an eligible student under an IPE but cannot be funded with the pre-employment transition services reserve:

- Personal devices (e.g. computers, laptops, tablets).
- Prescribed devices (e.g. eyeglasses, hearing aids, wheelchairs).
- Readers for personal use or study.
- Home or vehicle modifications.
- Attendant care or other ADL services.

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## Category B - Transition Services

Additional VR services may be paid for with the Pre-ETS set-aside funds if all of the following conditions are met:

- The services are necessary for the student to benefit from one or more of the five required pre-employment transition services, and
- The student has been determined eligible for vocational rehabilitation (VR) services, and
- The services are provided in accordance with an approved Individual Plan for Employment (IPE) and may include any of the following:
  - Assessment services.
  - Counseling and guidance.
  - Referral services.
  - Maintenance (required clothing, – necessary, reasonable and allocable for provision or receipt of Pre-ETS).
  - Transportation.
  - Personal assistance services.
  - Rehabilitation Teaching and Orientation and Mobility Services.
  - Rehabilitation Technology (Electronic device that doesn't constitute an auxiliary aid or service).
  - Services to Family Members (example: transportation, maintenance, personal care services, sign interpreter services).
  - Coaching Services.

Standard VR policies pertaining to the provision of these services apply.

## Category C - Employment Related Services

Transition Services include the provision of employment related services. These services occur when the student has identified a specific employment outcome (i.e., vocational objective) as included on a current, approved IPE. Employment related services may not be paid for with the Pre-ETS reserve funds. However, if these services are needed for a student who is eligible for VR to achieve competitive integrated employment, then they can be included on an IPE and paid for with VR dollars, not allocated to the Pre-ETS reserve funds. An eligible student with a disability may continue to receive any needed pre-employment transition services, as well as employment related services, as long as the individual continues to meet the definition of a student with a disability.

Employment related services typically include any of the following VR services, as necessary, to support the student's achievement of their specific vocational outcome:

- Supported Employment.
- Job Readiness Training.
- On-the-Job Training.
- Occupational/Vocational Training.
- Four Year College or University Training.
- Miscellaneous Training.
- Job Search.
- Post Employment Services.
- Customized Employment.
- Customized Training.
- Registered Apprenticeships.
- Junior or Community College Training.
- Graduate College or University Training.
- Self-employment.
- Job Placement.

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If the student does not already have an open VR case as described above, and they either no longer meet the definition of a student with a disability (e.g. ages out, no longer enrolled in a recognized education program), or no longer need pre-employment transition services, the Pre-ETS Transition Specialist will offer the student informed choice regarding the opportunity to apply for VR services. If the potentially eligible student is interested in applying for the VR program and wish to pursue competitive integrated employment through VR services, the Pre-ETS Transition Specialist will assist in coordinating the VR application process and providing the Pre-ETS case file to the VR Counselor. At the time of discontinuing the Pre-ETS case file, the student, VR Counselor and Pre-ETS Transition Specialist should coordinate a meeting to discuss progress and services for a smooth transition to VR services.

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PART Discontinuation of Pre-ETS

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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 9 Discontinuation of Pre-ETS

For a potentially eligible student with a disability who solely received pre-employment transition services and who has not applied or been determined eligible to receive other VR services, the Pre-ETS service record will remain “open” until the individual:

1. No longer meets the definition of a student with a disability, or
2. No longer expresses an interest in/needs pre-employment transition services, or
3. Is unable to be located or contacted (not available for pre-employment transition services)

For an eligible individual who still meets the definition of a student with a disability, but no longer expresses an interest in/needs pre-employment transition services, the Pre-ETS service record will be inactivated and the Pre-ETS Transition Specialist will discontinue pre-employment transition services. Any other VR service, including transition services will continue to be provided by the VR counselor, and the VR case will be closed in accordance with the typical case closure ([Section 5](#)).

If the student does not have a VR case, the Pre-ETS Transition Specialist is required to give information to the student about VR services and contact information at the time of the Pre-ETS discontinuation.

#### Process

- The student and parent/guardian (if applicable) must be consulted prior to discontinuing pre-employment transition services for an eligible or potentially eligible student with a disability.
- Choose the appropriate option below, and follow the procedures to inactivate the Pre-ETS service record:
  - **Option 1: No Longer Meets the Definition of a Student with a Disability**
    - Use the student’s graduation date for determining when the student is no longer in a recognized secondary education program; and put the case in inactive status if the student has decided not to participate in any recognized post-secondary education programs.
    - Verify that the graduation date in KMIS is correct and amend if necessary.
    - Pre-ETS Transition Specialist will contact the student/parent/guardian as soon as possible but no more than 15 calendar days prior to making the case discontinued.
    - Document in the Pre-ETS case service record how the student/parent/guardian was consulted and their agreement with the discontinuation of Pre-ETS.
    - Document the outcomes that the student achieved in all required services that the student participated in.
    - Verify and document that all expenditures have been concluded.
    - Send a discontinuation letter documenting the reason for being inactive with the appeal rights as soon as possible but no more than 15 calendar days of the date of inactivation.

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- **Option 2: Meets the Definition of a Student with a Disability and No Longer Interested in Services or Pre-ETS**
  - Once the Pre-ETS Transition Specialist is informed that the student is no longer interested in pre-employment transition services, contact the student/parent/guardian as soon as possible but no more than 15 calendar days prior to making the case inactive.
  - Document in the Pre-ETS case service record how the student/parent/guardian was consulted and their agreement with the discontinuation of Pre-ETS.
  - Document the outcomes that the student achieved in all required services that the student participated in.
  - Follow the procedures below if inactive prior to receiving any services to try to reengage the student.
  - Verify and document that all expenditures have been concluded.
  - Send a discontinuation letter documenting the reason for being inactive with the appeal rights as soon as possible but no more than 15 calendar days of the date of inactivation.
  
- **Option 3: Meets the Definition of a Student with a Disability and Unable to be Located or Contacted (unavailable for services)**
  - Make three to five attempts to locate the student through various methods, such as phone, text, mail, contacting school, contact name listed, etc. Document all contact attempts with the student/parent/guardian.
  - The Pre-ETS Transition Specialist need to staff the case with Pre-ETS Transition Manager prior to having the case inactivated for unable to contact.
  - Document the outcomes that the student achieved in all required services that the student participated in.
  - Follow the procedures below if inactive prior to receiving any services to try to reengage the student.
  - Verify and document that all expenditures have been concluded.
  - Send an inactive letter documenting the reason for being inactive with the appeal rights as soon as possible but no more than 15 calendar days of the date of inactivation.

## **Process for closing the case prior to the student receiving Pre-Employment Transition Services**

If this situation occurs for the Pre-ETS Transition Specialist, they will consult their Pre-ETS Transition Manager to ensure various methods have been used to contact the student/parent/guardian (if applicable). This is when we have not moved the student to a status 05. If the Pre-ETS Transition Manager agrees that the Pre-ETS Transition Specialist has made adequate attempts, then the Pre-ETS Transition Specialist will do the following:

- The Status 02, 03, 04 case would be moved to a status 12.
- Record the last attempt to contact as the “initial follow-up” in KMIS follow-up.
- Reconnect with the student at least once between four to six months and at least once ten to twelve months from the closure 12 status as long as the student would still meet Pre-ETS criteria.

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- After two attempts to reconnect during that twelve-month timeframe from status 12 closure and if the student is still not interested, the student's Pre-ETS case may move the case to a status 14.
  - (The Pre-ETS Transition Specialist is required to enter a follow-up into KMIS at initial, six-month follow-up, and twelve-month. This needs to be completed in KMIS as soon as possible, but no more than 15 calendar days from the contact date.)
- Send inactive letters as soon as possible, but no more than seven calendar days.
- Close in KMIS. This needs to be completed in KMIS as soon as possible, but no more than 15 calendar days from the last contact date.

If the parent/guardian and/or student requests not to be contacted, then the Pre-ETS Transition Specialist may close to status 14 without attempting to contact two times at six-month intervals.

## **Resuming services after discontinuation or inactive status**

There may be instances when a case has been discontinued or inactive, but the student would like to resume services and meets criteria to participate in Pre-ETS.

The following procedures will be followed to activate their case if the case was discontinued as a status 15:

- The student would not be required to submit a new request for services and information release.
- The Pre-ETS Transition Specialist would notify the Statewide Program Administrator to activate the case.
- The Pre-ETS Transition Specialist would need to document in the narrative to reflect the verification of disability that the student still meets criteria, justification of needs for Pre-ETS by using the disability documentation (IEP, 504, or medical documentation), pre-assessment, adult student/parent/guardian approval for resuming services and Pre-ETS Agreement.

The following procedures will be followed to activate their case if the case was inactive as a status 14:

- The student would not be required to submit a new request for services and information release, however if the student does submit a new Request for Services and information release, the Pre-ETS Transition Specialist would use the date the Request for Services and Information Release was submitted or returned as the new date in KMIS if the case was inactive a 02 or 03 status.
- If the case was inactive at status 04, there would be no dates needed to be adjusted in KMIS.
- If a new Request for Services and Information Release is not submitted the Pre-ETS Transition Specialist will use the date the student verbally requested as the new date in KMIS.
- The Pre-ETS Transition Specialist would notify the Statewide Program Administrator to activate the case.
- The Pre-ETS Transition Specialist would need to document in the narrative to reflect the verification of disability that the student still meets criteria, justification of needs for Pre-ETS by using the disability documentation (IEP, 504, or medical documentation), pre-assessment, adult student/parent/guardian approval for resuming services and Pre-ETS Agreement.