

# 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 and Coordination

Empowering youth 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 and self-reliance rather than dependency on public benefits.

#### Pre-ETS funding

As required by WIOA, RS will reserve 15% of its federal vocational rehabilitation funds for the provision of Pre-ETS.

*34 CFR 361.65(a)(3)*

Pre-ETS services are not subject to economic need.

#### Coordination

Pre-ETS services are to be provided and arranged in coordination with local education agencies. 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.
- Attending person-centered planning meetings.

*34 CFR 361.49(a)(4)*

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Student with Disabilities and Criteria for Participation in Pre-ETS

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

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

Coordination/collaboration between VR and Special Education is essential to assure that students with disabilities have access to the continuum of services they need to become employed and self-reliant. Pre-ETS services are available for students with disabilities who are Kansas residents at the time they request services.

- 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) and not older than age 21.
- In addition, the student must be participating in a secondary, post-secondary or other recognized education program. 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.
- The student meets one of the following criteria to verify disability: The student is eligible for and receiving services under an Individual Education Plan (special education) OR the student 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.

Students with disabilities may request Pre-ETS 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 (as defined above) can submit request for Pre-ETS services. RS will coordinate with the individual, the LEAs and the individual's IEP regarding initiation of and provision of services.

If the student is transitioning to post-secondary education and has a typical summer break prior to enrollment, the Pre-ETS case may remain open as long as the Pre-ETS Transition Specialist has obtained the following documentation:

- Documentation that the individual with a disability graduated from secondary ed., and
- Documentation that the individual with a disability has been accepted into a post-secondary education institution/program.
- Documentation of the individual with a disability intention or confirmation that they have accepted the invitation to enter the post-secondary program.

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- If the student is transitioning to post-secondary education and plans to take a break or gap year prior to enrollment, the Pre-ETS case may remain open, as long as the Pre-ETS Transition Specialist has obtained the following documentation:
  - Documentation that the individual with a disability graduated from secondary ed., and
  - Documentation that the individual with a disability has been accepted into a post-secondary education institution/program.
  - Documentation of the individual with a disability's intention or confirmation that they have accepted the invitation to enter the post-secondary program.
  - Documentation that the individual with a disability has been informed by the institution that their "seat" or "spot" is being held for them.

If the student is determined to meet the disability criteria while in high school and continues to meet the recognized education program and age requirements no further disability documentation is required.

## **United States citizen**

Pre-ETS is an employment preparation program. Therefore, if the student is not a U.S. citizen, the student must be authorized to work in the United States (have a VISA or work authorization card which permits employment in the competitive integrated marketplace).

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

### Part 3 Processing Referrals and Requests for Services

A student with a disability may be referred for Pre-ETS services by a third party, such as the school, a foster care service provider, or other individual or entity.

#### Referral Forms

[Referral from school to East Region](#)

[Referral from school to West Region](#)

[Referral from school to Wichita Region](#)

[Referral from school to Kansas City Region](#)

[General Referral form for DCF personnel to send Pre-ETS](#)

A student with a disability, his or her parents, legal representatives or guardians may also request services directly.

#### [Request for Services Form](#)

Referrals or Request for Services may be faxed, emailed if encrypted to protect confidentiality, or mailed to the Pre-ETS Manager for the region. Pre-ETS Transition Specialists may also receive Referrals or Requests for Services at meetings with school personnel, schools or families.

All Referrals and Requests for Services shall be date stamped when the documents are first received by any part of DCF. If the Transition Specialist receives a verbal referral for a student, the Transition Specialist would enter the information into KMIS for the referral and document in the narrative when the verbal referral was received.

The student and parent/guardian (if applicable) must sign the Request for Services. If Pre-ETS staff receive a request for services signed by a parent without the student's signature, Pre-ETS staff may move forward with that request for services. Pre-ETS staff would need to get the student's signature as soon as possible. At the point students turn 18 years of age, assume they are their own guardians unless the family or school informed Rehabilitation Services otherwise. The student can request to have a representative for his or her case. 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. If the student is 18 or older and wants Pre-ETS to share case information with parents or others, get the required release of information form signed.

### Processing Referrals and Requests for Services

- The Manager enters the information into the Pre-ETS Kansas Management Information System (KMIS) database as soon as possible, but no later than seven calendar days from the date DCF received the Referral or Request for Services. The Manager will assign the case to the appropriate Transition Specialist.

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- If a Transition Specialist receives a Referral or Request for Services in person or through other means, the Transition Specialist shall enter the information into the KMIS database as soon as possible, but no later than seven calendar days from the date DCF received the Referral or Request for Services. In these circumstances, the Transition Specialists will assign such cases on KMIS to themselves.
- The Transition Specialist will contact the school contact or other referral source (if they referred) student, and parent/guardians (if applicable) as soon as possible, but no later than 15 calendar days from receiving the Referral or Request for Services and send a follow-up letter confirming appointment date, next steps, and additional Pre-ETS information. If the Transition Specialist schedules an appointment within five calendar days from contact date the follow up letter is not required because the referral source and parent/guardians (if applicable) would likely not receive it prior to the meeting. In such situations the same information contained in the follow up letter would be discussed in the first appointment and documented in the narrative.
- Once contact is made, the Transition Specialist will:
  - Schedule an appointment within 15 calendar days or sooner unless the student's or parent/guardian's (if applicable) schedule does not permit. The appointment could be at the school, DCF office, or public location.
- Send a Request for Services to be completed (if it has not already been provided) and appointment letter. If the Transition Specialist schedules an appointment within five calendar days from contact date the follow up letter is not required because the referral source and parent/guardians (if applicable) would likely not receive it prior to the meeting. In such situations the same information contained in the follow up letter would be discussed in the first appointment.
- 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 if applicable before just sending a letter or email.

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.

The Pre-ETS Transition Specialist shall make every effort to reach the student as quickly as possible. The Transition Specialist shall use all methods available from the information that was provided: phone, address, email address, school contact, DCF programs, etc.

The Transition Specialist may not screen out a referral during breaks from school.

If the student indicates he or she is not interested in Pre-ETS services, the Transition Specialist will reconnect with the student at least two times at six-month intervals each as long as the student would still meet criteria. (The two attempts need to be six months apart after the initial referral. Therefore, Pre-ETS will try to reconnect with the student to determine if his/her interest has changed two times during the first year following the referral date). After two attempts and if the student is still not interested, the student's Pre-ETS case may be closed due to lack of interest. The Transition

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Specialist will send a referral closure letter as soon as possible, but no later than five calendar days. The Transition Specialist is required to enter a referral follow up in KMIS at initial, 6 month follow up, and 12 month follow up for referrals. This needs to be completed in KMIS as soon as possible, but no later than 15 calendar days. KMIS will be used to provide a reminder tracking system for referral follow-ups. If the parent and/or student request to not be contacted, then the Transition Specialist may close out the referral without attempting to contact two times at six-month intervals.

If the student indicates he or she is not interested in Pre-ETS services after submitting a **request for services** or after the Transition Specialist **completes the determination**, the Transition Specialist will reconnect with the student at least two times at six-month intervals each as long as the student would still meet criteria. (The two attempts need to be six months apart after the date received on the request for services. Therefore, Pre-ETS will try to reconnect with the student to determine if his/her interest has changed two times during the first year following the request for services). After two attempts and if the student is still not interested, the student's Pre-ETS case may be closed due to lack of interest. The Transition Specialist will send a closure letter as soon as possible, but no later than five calendar days. The Transition Specialist is required to narrate the attempts in the case file. If the parent and/or student request to not be contacted, then the Transition Specialist can close out the referral without attempting to contact two times at six-month intervals.

## Guidance for the above policy

If this situation occurs for the Pre-ETS Transition Specialist, he/she will consult their Pre-ETS Manager to ensure various methods have been used to contact the student/parent (if applicable). If the Pre-ETS Manager agrees that the Pre-ETS Transition Specialist has made adequate attempts, then the Pre-ETS Transition Specialist will do the following:

- Close the 02 or 03 case as a status 15, and then reopen it as a Status 01.
- Record the last attempt to contact as the "initial referral follow-up" in KMIS referral follow-up.
- Reconnect with the student at least 2 times at six-month intervals each as long as the student would still meet criteria.

(The two attempts need to be six months apart after the initial referral. Therefore, Pre-ETS will try to reconnect with the student to determine if his/her interest has changed two times during the first year following the referral date.)

- After two attempts and if the student is still not interested, the student's Pre-ETS case may be close due to "lack of interest."

(The Pre-ETS Transition Specialist is required to enter a referral follow-up into KMIS at initial, 6-month follow-up, and 12-month follow-up for referrals. This needs to be completed in KMIS as soon as possible, but no later than 15 calendar days.)

- Send a Referral Closure letters as soon as possible, but no later than five calendar days.

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- Close the referral in KMIS. This needs to be completed in KMIS as soon as possible, but no later than 15 calendar days.

KMIS will be used to provide a reminder tracking system for referral follow-ups. If the parent and/or student requests not to be contacted, then the Pre-ETS Transition Specialist may close the out the referral without attempting to contact two times at six-month intervals.

## Determining if criteria for participation in Pre-ETS are met

Key documents that may be used to verify that student meets the criteria to participate in Pre-ETS services are:

- The student's IEP. (The IEP should be based on disability, and therefore this criteria does not include IEPs for students in gifted programs unless they also have a disability).
- The 504 Plan.
- Medical records documenting disability.
- Verification of eligibility of Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI) based on the student's disability. (For this criteria, the student must be *eligible* for SSI or SSDI based on disability. However, it does not mean that the student must *currently be receiving* a benefit or cash payment.) Students may request verification using the Social Security website. See instructions.
- Verification for enrollment in post-secondary education for individuals who meet the age range for a student with a disability. If a student with a disability is taking a "gap year" there are four pieces of documentation the individual needs to be considered enrolled in a recognized post-secondary education program. 1. Documentation that the individual with a disability graduated from secondary ed. 2. Documentation that the individual with a disability has been accepted into a post-secondary education institution/program. 3. Documentation of the individual with a disability's intention or confirmation that they have accepted the invitation to enter the post-secondary program. 4. Documentation that the individual with a disability has been informed by the institution that their "seat" or "spot" is being held for them. If a student with a disability is taking a typical summer break there are three pieces of documentation required to verify that the individual continues to be considered enrolled in a recognized education program. 1. Documentation that the individual with a disability graduated from secondary ed. 2. Documentation that the individual with a disability has been accepted into a post-secondary education institution/program. 3. Documentation of the individual with a disability intention or confirmation that they have accepted the invitation to enter the post-secondary program.

**Instructions:** [Social Security Administration Benefit Verification letter instructions](#)

If the school, student, or parent/guardian sent the IEP, 504 Plan, medical records or SSI/SSDI verification to be reviewed, then the Transition Specialist should proceed to making a determination of whether the criteria for participation are met. ([See Section 7/Part 2](#)). The Transition Specialist has 15 calendar days to complete determination from the date the Request for Services was received.

If there was no documentation provided for determination then the Transition Specialist shall request the documentation as soon as possible, but no later than five calendar days. If information was provided but it is not sufficient to make a determination, then the Pre-ETS Transition Specialist will

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ask for documentation to review from the parent or school. In these circumstances, the Pre-ETS Transition Specialist has 30 calendar days to complete determination from the date the Request for Services was received.

The Transition Specialist will send a letter to the student and parents, if applicable, to notify them of the determination decision as soon as possible, but no later than five calendar days. If the student does not meet the criteria to participate, the 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 as soon as possible, but no later than five calendar days.

If the student meets the criteria to participate, then the Transition Specialist will schedule an appointment to work with the student and parent/guardian, if appropriate, to jointly develop and complete the Pre-ETS plan, and enter into KMIS within 30 calendar days.



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

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

#### Initial Interview

To begin the process of developing a Pre-ETS Plan of services to be provided, the Transition Specialist will complete the initial interview with the student and parent/guardian (if applicable).

#### [Initial Interview](#)

#### Pre-ETS Plan

The Transition Specialist will work with the student and parent/guardian (if appropriate) to develop the Pre-ETS Plan. The Plan identifies the services to be provided, participation responsibilities, and expectations. The Plan shall be written, signed, and finalized in KMIS within 30 calendar days from determination. The Plan shall be reviewed, finalized in KMIS, and signed by student at least annually by the Transition Specialist and the student (parent if applicable). The Plan narrative and services should reflect informed choice by the student, document the needs the student has based on records (IEP, 504 plan, or medical records), and needs expressed by other parties if applicable (parent, teachers, etc.) The plan needs to include evaluation criteria on how and when the student's progress will be evaluated. The Plan needs to be updated prior to dates expiring on the Plan. Amendments to the Plan do not take effect until agreed to and signed by student, parent (if applicable) and Transition Specialist.

#### [Pre-ETS Plan](#)

#### Available services

RS is required to offer the Pre-ETS listed below. However not every service will be provided to each student, depending on his/her needs, interests and informed choice and depending on the capacity of the program within the available funding. The Pre-ETS plan will identify the specific services that will be provided and the projected timelines.

- Job Exploration Counseling
  - Provides students with disabilities the opportunity to match their skills and interests
  - Administration of vocational interest inventories
  - Review labor market information
  - Explore jobs/careers in the community
  - Connect the student to other resources in the community
  - Review the Kansas Career Navigator
- Instruction in self-advocacy (including instruction in person-centered planning), which may include peer mentoring (including peer mentoring from individuals with disabilities working in competitive integrated employment).
  - Empowers students with disabilities to express their needs and goals in a variety of settings like school and work

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- Helps students learn their rights and responsibilities under IDEA, 504, and ADA
  - Identifies self-advocacy skills and why they are important
  - Helps students learn to request accommodations, auxiliary aids or services, and supports
  - Helps the student build their own advocacy skills
  - Connects the students to other resources in the community
- Work-based learning experiences, which may include in-school or after school opportunities, or experience outside the traditional school setting (including internships), that is provided in an integrated environment in the community to the maximum extent possible
  - Pre-ETS will provide work-based learning experiences where youth can learn the skills necessary to succeed in the workplace and experience the benefits of earned income.
  - Facilitate job shadowing and/or mock interviews
  - Connect students to career track and/or other work-based learning programs
  - Identify paid and unpaid local businesses for work-based learning experience opportunities

## ***Criteria to participate in paid work-based learning experiences***

Rehabilitation Services will emphasize paid work-based learning experiences for qualifying students with disabilities. However, the number of paid work-based learning experiences in any given community are limited by funding, provider capacity, and available worksites.

- The student has to be within his or her last 18 months before exiting secondary school.
- The student has the ability to get to and from the work experience.
- The parent/legal guardian's signed approval to participate.
- The student is committed to completing 240 hours within a year.
- The student has the necessary supports such as but not limited to job coaching in place for the work experience if applicable.
- Any student with a disability who is not a U.S. citizen must have employment authorization documentation.
- The paid work-based learning experience is not allowed to occur during the school day unless the student has early release because he or she has met the high school graduation credits. Pre-ETS is not allowed to take over the school district responsibility to provide services to the student.
- 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 manager on a case-by-case basis. The student will be able to continue to receive other available services if he or she continues to meet the criteria to participate in Pre-ETS.

## **Provider Agreement Service Descriptions**

Service Description with Local Area Workforce Development Centers, Boards, and Operators

Service Description with Center for Independent Living Centers

Students participating in work-based learning experiences will be compensated at \$8.25 per hour. Payroll and workers compensation coverage will be processed through an RS contract with Key Staffing.

## **Key Staffing forms for student compensation**

- Workplace readiness training to develop employment skills
  - Supplies students with disabilities with the opportunity to learn power skills necessary for success on the job; such as customer service, how to interact with co-workers, supervisors, being on time, etc.

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- Connect students with America Job Centers (AJC), **KANSASWORKS**
  - Identify resources to develop social and independent living skills
  - Identify and discuss employability skills
  - Connect the students to other resources in the community
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education (universities, community colleges or technical schools)
  - Provides a clear path to students with disabilities employment future
  - Provide information on connecting students to education opportunities including Disability Support Services
  - Discuss reasonable accommodations and auxiliary aids for success in training and academic settings
  - Educate and inform students about post-secondary training programs
  - Connect the students to other resources in the community

## 34 CFR 361.48(a)(2)

In addition, Pre-ETS funds may be used for the provision of auxiliary aids and services for 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.*

**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** — As another example, for an individual who is deaf, 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** — On the other hand, 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 he or she meets the eligibility criteria of vocational rehabilitation. If yes, then an Individual Plan for Employment should be developed to include those additional services through VR funding, not Pre-ETS funding.

**Example 4: Not Allowed with Pre-ETS funds** — In addition, other services which cannot be funded by Pre-ETS may be determined necessary for the student to effectively participate in

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Pre-ETS 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 through VR funding, not Pre-ETS funding.

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

## Group services

Pre-ETS may be provided in individual settings, as described above, or in group settings. All group setting participants have to be active Pre-ETS students with a Pre-ETS plan.

Below are examples of services in a group setting:

General job exploration counseling in a group setting may be provided in a classroom or community setting and could include:

- Information regarding in-demand industry sectors and occupations, as well as nontraditional employment.
- Information about labor market composition.
- Administration of vocational interest inventories.
- Identification of career pathways of interest to the students.

Work-based learning experiences in a group setting may include:

- Coordinating a school-based program of job training and informational interviews to research employers.
- Work-site tours to learn about necessary job skills.
- Job shadowing.
- Mentoring opportunities in the community.

Counseling on opportunities for enrollment in transition or post-secondary educational programs at Institutions of Higher Education in a group setting may include providing information on:

- Course offerings.
- Career options.
- The types of academic and occupational training needed to succeed in the workplace.
- Postsecondary opportunities associated with career fields or pathways.

Workplace readiness training services may be offered in a generalized manner in a classroom or other such group settings to provide programming to assist students with disabilities to develop social skills and independent living skills necessary to prepare for eventual employment. These services could teach skills such as:

- Communication and interpersonal skills.
- Financial literacy.
- Group orientation and mobility skills (i.e., to access workplace readiness training or to learn to travel independently).
- Job-seeking skills.
- Understanding employer expectations for punctuality and performance, as well as other “soft” skills necessary for employment.

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Instruction in self-advocacy services may be provided through generalized classroom lessons in which students:

- Learn about their rights and responsibilities.
- Learn how to request accommodations or services and supports.
- Communicate their thoughts, concerns, and needs, in order to prepare them for peer mentoring opportunities with individuals working in their area(s) of interest.

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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 him or her to independently authorize and pay for services *within the specified authority*. Authorizations that exceed the Transition Specialist's authority must receive additional approval through the exceptions process.

To request such approval, the Transition Specialist completes an exception form indicating the justification on why the service is necessary and required.

- The Pre-ETS Manager reviews such requests. The Manager has authority to approve \$500 dollars more than the Pre-ETS Transition Specialist spending authority. In the event that the Pre-ETS 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 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 Transition Specialist, Pre-ETS Manager, RS Program Administrator and the Statewide Pre-ETS Program Administrator.

#### [Exception form](#)

In the table below, LOC refers to the "life of the case," 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.

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Service Code	Unit	Examples	Transition Specialist spending authority
450 Job exploration counseling	Each	Provided by Pre-ETS Service Provider Agreement	\$500 LOC
451 Instruction in self-advocacy	Each	Provided by Pre-ETS Service Provider Agreement	\$500 LOC
452 Workplace readiness training	Each	Provided by Pre-ETS Service Provider Agreement	\$500 LOC
453 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 LOC
454 Work-based learning experiences	Hour	Provided by Pre-ETS Service Provider Agreement	\$1,090 LOC No exceptions available
455 Work-based learning experiences student wages	Hour	Key Staffing (temporary employment agency contracted by RS to provide payroll services and workers compensation coverage)	\$3,499.20 LOC No exceptions available
456 Work-based learning experiences successful completion	Each	Service Provider Agreement	\$1750 LOC No exceptions available
457 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-ETS services)	Hour	Qualified interpreters on-site or through video remote interpreting (VRI) services	\$3,000 LOC Refer to Part 12a of the policy manual for State Contract use

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458 Travel Time for Sign Language Interpreters (service is only available when necessary to participate in the Pre-ETS services)	Hour	Hourly professional fee for travel time. This service requires approval from the Administration Office. Mileage would be Service Code 459	\$150 PA
459 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. Annual changes will be announced by Rehabilitation Services Administration prior to implementation. Effective March 23, 2016, the mileage rate is 35 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. 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. (service is only available when necessary to participate in the Pre-ETS services)	Mile	Mileage for Sign Language Interpreters	\$200 PA



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<p>460 Auxiliary aids for students who are deaf or hard of hearing (service is only available when necessary to participate in the Pre-ETS 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 LOC</p>
<p>461 Auxiliary aids and services for students who are blind or visually impaired (service is only available when necessary to participate in the Pre-ETS services)</p>	<p>Each</p>	<p>Qualified readers; taped texts; audio recordings; Brailled 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 LOC</p>

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462 Empower Me Workshop	Each	Service Provider Agreement	\$350 LOC No exceptions available
463 IEP Meeting	N/A	Provided in-house by Pre-ETS	None
464 VR Collaboration Meeting	N/A	Provided in-house by Pre-ETS	None
465 DCF Foster Care/Independent Living Collaboration Meeting	N/A	Provided in-house by Pre-ETS	None

# Rehabilitation Services Policy Manual

SECTION Pre-Employment Transition Services (Pre-ETS)  
PART Fiscal Accountability and Authorization of Services

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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.

#### *34 CRF 80.20(a)*

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. Payments made directly to Pre-ETS students must be allowable, authorized and supported by original receipts, bank records, lease or rental agreements or other documentation.

*Reference: Rehabilitation Services Administration 2012 Monitoring Report*

#### Authorizing 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 for Pre-ETS to pay for them. 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 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.

#### 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 for payment.

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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 and invoice Pre-ETS 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.
- All purchases are exempt from state and local sales tax. A copy of the tax-exempt certificate is available at the following link:  
[http://dcfnet.dcf.ks.gov/West/Documents/Divisions/FiscalServices/Tax%20Exempt\\_Exp\\_10\\_01\\_20.pdf](http://dcfnet.dcf.ks.gov/West/Documents/Divisions/FiscalServices/Tax%20Exempt_Exp_10_01_20.pdf)
- Upon receipt of the invoice, payments need to be made as soon as possible, but no longer than 30 calendar days.
- An Auxiliary Aids Equipment Loan Form must be completed by the student and Pre-ETS Transition Specialist for equipment purchased, and the form must be maintained in the case file.

## [Auxiliary Aids Equipment Loan Form](#)

- 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.

## **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 the following, as applicable to the specific purchase: the service authorization, payment authorization, invoices, equipment loan forms and receipts/purchase documentation.

## **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 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.

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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 vender 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.**

1. Staff need to call/email to speak with the provider/vendor to let them know and ensure there are no pending bills associated with that authorization
2. Send the cancellation notice to them
3. Send to your RS Manager to cancel the authorization on KMIS
4. Narrate your conversation, when you sent cancellation notice, person you spoke with, and authorization numbers that you cancelled on the date that it occurred
5. Staple the authorizations and cancellation notice together and put in case file

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Pre-Employment Transition Services (Pre-ETS)  
Case Transfer Guidelines

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

### Part 7 Case Transfer Guidelines

Every effort should be made to maintain contact with a student in the event he or she relocates.

If a student relocates, the Pre-ETS Transition Specialist will inform his or her Pre-ETS Manager to facilitate the transfer of the case on Pre-ETS KMIS.

The current Pre-ETS Transition Specialist will update the student's address in Pre-ETS KMIS. The current Pre-ETS Transition Specialist will send an email or call the new Pre-ETS Transition Specialist regarding the services provided and the services the student still pending.

Then Pre-ETS Manager will finalize the transfer on KMIS.

It is essential that Pre-ETS staff keep students engaged to facilitate prompt transfer. It is best practice for the current Pre-ETS Transition Specialist to coordinate a conference call with the student and new Transition Specialist to facilitate introductions, explain the case status and encourage ongoing involvement. A specific date and time should be coordinated for the student and new Transition Specialist to meet.

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SECTION  
PART Pre-Employment Transition Services (Pre-ETS)  
Case File Documentation and Narrative

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

### Part 8 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 determination decisions, service decisions and the expenditure of public funds.

The Pre-ETS Plan 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, narratives should address:

- What occurred: (decision made, student reported progress, student progress and outcomes during the session, discussions of required services, information requested, 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.

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.

Narratives are necessary for information that cannot be found or not clearly shown in other records. Narratives are essential to recording the Pre-ETS Transition Specialist rationale for actions taken. Generally, narratives should address: what occurred; the student's involvement; decisions made; student progress/outcomes; information requested; each student contact; attempted student contacts; other party contacts, such as guardians, agencies, providers, employers; and suggested next steps. 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.

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Care should be taken to assure that other student names aren't 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.

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, school, provider, etc. The case file narrative also needs to record the letter or document being sent and the date.

All 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:

- Referral
- Signed and date stamped Request for Services
- Signed and dated Pre-ETS Plan and Pre-ETS Plan reviews
- Determination
- Documentation verifying student meets the criteria for participation in Pre-ETS
- IEP, Section 504 Plan, other disability documentation, SSI/SSDI eligibility verification

Right section:

- Student history (KMIS printout)
- Closure letter
- KMIS printout of closure screens (after implementation of revised screens)
- Case narrative
- Required Services (KMIS printouts)
- Initial Interview
- Service provider reports
- Correspondence, such as referral letters and authorization cover letters
- Release of information forms
- Authorization and payment records
- Equipment Loan reports

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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SECTION Pre-Employment Transition Services (Pre-ETS)  
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## Frequency of Contact

Frequency of contact should be determined by the individual circumstances; however, at least 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), and/or face-to-face meeting with the student. The form of contact should be based on the student's preference of contact. The 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 being taken to resume services.

## 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 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.

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

The Pre-ETS Transition Specialists will enter into 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.

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<b>Job exploration counseling Service Code: 450</b>	<b>Instruction</b>	<b>Examples</b>
Date	This is the date the service was provided.	05/12/2017
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 6/12/2017 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.	05/12/2017
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 his 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 6/12/2017 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.	05/12/2017
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 his 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 6/12/2017 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.	05/12/2017
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 his 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 6/12/2017 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.	05/12/2017
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 amount 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 his 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 6/12/2017 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.	05/12/2017
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 6/12/2017 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.	05/12/2017
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 6/12/2017 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.	05/12/2017
Group/Individual	Did this occur in a group or individual setting?	This was completed in a 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 his disability and advocated his needs during this meeting.
Next Steps	The next steps that Pre-ETS and student will be making.	Pre-ETS has scheduled a meeting for 6/12/2017 to continue working on Pre-ETS work readiness training.

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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.	05/12/2017
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 6/12/2017 to continue working on Pre-ETS work readiness training.

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SECTION Pre-Employment Transition Services (Pre-ETS)  
PART Pre-ETS KMIS Case Status Codes

SECTION NO. 7-9  
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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 9 Pre-ETS KMIS Case Status Codes

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

01	Referral
02	Request for services
03	Determination
04	Pre-ETS plan
05	Services being provided
14	Referral Closure
15	Closure

# Rehabilitation Services Policy Manual

SECTION Pre-Employment Transition Services (Pre-ETS)  
PART Collaboration with Vocational Rehabilitation Services

SECTION NO. 7-10  
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## Section 7 Pre-Employment Transition Services (Pre-ETS)

### Part 10 Collaboration with Vocational Rehabilitation (VR) Services

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-ETS
- Transition services through the Vocational Rehabilitation (VR) program
- VR Services

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

#### Collaboration between Pre-ETS and VR

##### *Option 1*

A student who is receiving Pre-ETS services may need other services which are not within the scope of available Pre-ETS services and therefore cannot be funded with Pre-ETS dollars or cannot be provided without being eligible for VR services with an approved IPE. Such services may include job coaching, clothing for work-based learning experiences, or transportation. At the time of closing the Pre-ETS case, 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.

In such cases, if a VR service is necessary for the student to participate in Pre-ETS, then the VR Counselor and Pre-ETS Transition Specialist will coordinate to:

- Facilitate the student's application for VR services.
- Facilitate documentation necessary for the VR Counselor to determine eligibility for VR services. (Since Pre-ETS and VR are both under the Rehabilitation Services/Vocational Rehabilitation umbrella, records may be shared between programs.) 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 IPE should be developed to include these additional services through VR funding, not Pre-ETS funding.
- Discuss development of the VR Individual Plan for Employment (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 Pre-ETS and VR cases open at the same time in order to coordinate the provision of necessary services. If a VR case and Pre-ETS case are 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



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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, skype, 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.

## Seamless services

Coordination/collaboration between VR Counselors and Pre-ETS 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

Funds set aside for Pre-Employment Transition Services (Pre-ETS) will be used to pay for the following required Pre-ETS services:

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

Auxiliary aids and services may be funded under this category if they are necessary for the student to access or participate in the required Pre-ETS services.

### Category B

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 required Pre-ETS services, and
- The student has been determined eligible for vocational rehabilitation (VR) services, and
- The services are included on an Individual Plan for Employment (IPE) and fall into one of the following categories:
  - Assessment services

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- 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, interpreter services)
- Job Coaching
- Books, tools, or other training material to participate in Pre-ETS

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

## Category C

The following services may not be paid for with the Pre-ETS set-aside 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.

- Medical services
- Post-secondary education
- Vocational training
- Job search
- Job placement
- Job retention
- Job follow up
- Job follow-along services
- Any other necessary services within the scope of available VR services.

## Option 2

After completing Pre-ETS services or aging out, the student may wish to pursue competitive integrated employment through VR services. If the student does not already have an open VR case under Option 1 described above, the Pre-ETS Transition Specialist will assist in coordinating the VR application process and providing copies of Pre-ETS records to the VR Counselor. At the time of closing the Pre-ETS case, 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.

## Process for referring to VR Services

Pre-ETS staff will complete the student information sheet and release of information to VR when the student or parent/guardian (if applicable) have expressed interest in applying for VR. If the student has decided to apply for VR, the Pre-ETS staff will provide the VR Counselor with the VR application, release of information, copy of the Pre-ETS Request for Services, IEP, initial interview, and services.

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Best practice is for Pre-ETS to help coordinate an initial VR meeting where the student, parent/guardian if appropriate, VR counselor, and Pre-ETS Transition Specialist all attend.

Youth with disabilities may apply for VR 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 youth with a disability can submit an application for VR and transition services. Federal regulations define youth with disabilities as individuals who are not younger than 14 years of age and not older than 24 years of age. RS will coordinate with the individual, the LEAs and the individual's IEP regarding initiation of and provision of services. The Pre-ETS Transition Specialist must complete the referral to VR within 30 days from the date the student desired on the Pre-ETS Plan.

[Student Information Sheet](#)

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

### Part 11 Case Closures

The student and parent/guardian (if applicable) must be consulted prior to case closure. The Transition Specialist must close the case once the student no longer meets criteria as soon as possible, but no longer than 15 calendar days unless the Pre-ETS Transition Specialist hasn't received a bill from the vendor to finalize the payments. The narrative should reflect the reason why closure hasn't occurred. The Transition Specialist can use the student's graduation date for determining when the student is no longer in a recognized education program for case closure if the student has decided not to participate in any recognized education programs after secondary education. The Transition Specialist must make contact with the student within 15 calendar days prior to closing the case to discuss closure with the student and to ensure the closure is appropriate. The Transition Specialist is required to send a closure letter documenting the reason for closure with the appeal rights within 15 calendar days of the date of closure. The Pre-ETS Transition Specialist needs to document the outcomes that the student achieved in all required services that the student participated in.

To close a case for unable to contact, the Transition Specialist should make three to five attempts to locate the student. Various methods, such as phone, text, mail, contacting school, contact name, etc., should be used. The Transition Specialist need to staff the case with Pre-ETS Manager prior to closing the case for unable to contact. The case closure process is the same for this situation.

Pre-ETS cases may be closed for the following reasons:

- The student is working with VR as his/her primary focus.
- The student has overcome all barriers and working in a competitive integrated employment setting.
- The student decided to pursue employment in a subminimum wage job.
- The student decided he or she didn't want to work.
- The student is attending post-secondary training.
- The student completed post-secondary training and is looking for employment, but they do not need VR services.
- The student has decided to participate in non-work activities.
- The student no longer meets the criteria.
- The student declined services.
  - Reason
- Pre-ETS cannot locate the student after repeated efforts.
- Other

### Resuming Services After Case Closure

There may be instances when a case has been closed, but the student would like to resume services and meets criteria to participate in Pre-ETS. The Transition Specialist would document the situation in the narrative, review the information in the file and KMIS to ensure information and changes are not needed, and complete an updated Pre-ETS plan. The student would not be required to submit a new

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request for services. If new documentation is needed for the determination, then the Transition Specialist would need to obtain that information to update the determination. If the student wants to resume services and the student was closed, the closure would be deleted, and services would be continued under the same case number. The Transition Specialist would need to document in the narrative the reason the student wants to resume services and that determination documentation was reviewed to determine if the student still meets criteria. The Transition Specialist would also need to update the Pre-ETS plan unless it had not expired during the time it had been closed.

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

### Part 12 Sign Language Interpreter Services

#### Requirements

Fees for sign language interpreting and related conditions such as minimum appointment times, coverage areas, mileage, cancellation policies and specializations, are governed by State Contracts issued by the Kansas Department of Administration. RS staff may schedule directly with the vendors on state contract.

Updates to this information about the state contracts are pending. Meanwhile the contracts may be found at:

[https://supplier.sok.ks.gov/psc/sokfsprdsup/SUPPLIER/ERP/c/NUI\\_FRAMEWORK.PT\\_LANDINGPAGE.GBL?&](https://supplier.sok.ks.gov/psc/sokfsprdsup/SUPPLIER/ERP/c/NUI_FRAMEWORK.PT_LANDINGPAGE.GBL?&)

Search for contractors using the key words: sign language interpreting.

RS will schedule and authorize payment for certified and qualified sign language interpreters for appointments with people who are deaf or hard of hearing who use sign language for communication. They may require at least 24 hours' notice to find a qualified interpreter. The Kansas Commission for the Deaf and Hard of Hearing (KCDHH) may identify qualified interpreters and schedule them as a purchased service.

Written communication with persons who are deaf or hard of hearing is acceptable only:

- If used to set up appointments;
- If used to inform the person that an interpreter will be present at the appointment; or
- If specifically requested by the person who is deaf or hard of hearing.

RS is allowed to use sign language interpreters that are not on the state contract as long as we have not spent more than \$5000 during the state fiscal year with the specific sign language interpreter statewide. If \$5,000 is spent with a sign language interpreter, we would be required to use one of the contractors on the master statewide list.

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.

#### Rehabilitation Services (RS) Procedures

Interpreters must be on the state registry at the KCDHH, as required by state law, H.B. 2257 effective 7-1-93.

In situations where an interpreter is not listed on the state registry, the interpreter must contact KCDHH at (785) 267-6100 or toll-free at 1-800-432-0698 to register. Registration may be made over

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the phone by providing name, address, telephone number, certifications, and the sign language or sign systems that the interpreter can use, or by completing and mailing a registration card. The most common sign language or sign systems are American Sign Language (ASL), Pidgin Sign English (PSE), Conceptually Accurate Signed English (CASE), Sign Exact English (SEE) II, and oral.

When calling to schedule an interpreter, the following information is required:

- Date, time and location of appointment or appointments.
- Estimated length of appointment. When appointments are expected to last more than 3 hours, rest breaks for the interpreter will be required; or two interpreters rotating every 20 to 30 minutes may be scheduled.
- Topic or type of setting.
- Name of the individual(s), language preference or the need for special communications, specific interpreter selected by the individual(s), if known and appropriate. Note: Family members, roommates or individuals with other personal relationships may not be appropriate to use as interpreters. Staff should use discretion and consult with the client if possible. The Interpreter Code of Ethics requires the interpreter to decline the job if inappropriate.
- Contact person's name and phone number.
- Billing information such as the party responsible for payment, service authorization number or special billing instructions.

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

### Part 13 Appeals

#### Review of Pre-ETS Transition Specialist decisions

Students who are dissatisfied with any determination by the Pre-ETS Transition Specialist regarding the provision or denial of Pre-Employment Transition Services may request timely review of those determinations through a mediation process, informal resolution or formal hearing. A student's or applicant's representative may also make such a request.

Such requests must be made within 30 days of the agency decision in question.

Students are informed of their appeal rights in writing at key stages of the process. Key stages of the Pre-ETS process include, but are not limited to: request for services, determination, Pre-ETS Plan, Pre-ETS Plan amendments, any adverse action, and case closure.

Information provided to students and parents/guardians, if applicable, must include the name and address with whom to file requests for reviews. Information about the Client Assistance Program (CAP) must also be provided. This information will be made available in an accessible mode of communication.

**Informal resolution:** Students are encouraged to discuss any problems directly with their Pre-ETS Transition Specialist or Pre-ETS Transition Specialist's manager to see if the problem can be resolved. Or, an administrative review may be conducted by a RS Program Administrator who has not been involved in the case. Use of these informal methods is not required. If the student chooses not to pursue informal methods, or if the issues were not resolved informally, the next step is mediation or a formal hearing which must be requested within 30 days of the adverse action to the Kansas Office of Administrative Hearings.

**Mediation:** Applicants and eligible students may resolve disputes through mediation. Mediation services must be presented as an option whenever a student requests a fair hearing.

- Mediation is voluntary.
- Mediation may not be used to deny or delay the rights of an student to a fair hearing or to any other rights afforded that student under Title I of the Rehabilitation Act.
- Mediation must be conducted by qualified and impartial mediators.
- Services may not be suspended, reduced or terminated pending the mediation process. Exceptions to this requirement would include situations where the student requests the change in services, or situations where the student and/or his/her representative have obtained the services through misrepresentation, fraud or criminal conduct.
- If an agreement is reached, the mediator will put the agreement in writing.
- All information learned during mediation is confidential and cannot be used in subsequent appeal actions.



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**Formal hearings (fair hearings):** These hearings are conducted by Fair Hearing Officers from the Office of Administrative Hearings. These hearings must occur within 45 days of a student's request for review, unless resolution is achieved or the parties agree to a specific extension of time. While such a hearing is pending, services being provided under a Pre-ETS Plan may not be suspended, reduced or terminated unless requested by the student or unless there is evidence that the services have been obtained through misrepresentation or fraud. All requests for fair hearings must be forwarded to the Pre-ETS Statewide Pre-ETS Program Administrator, Deputy Directors, and RS Director.

During a fair hearing, the student or his/her representative and the agency have the opportunity to present evidence or witnesses and to question other witnesses and evidence. The student may be represented by an attorney or advocate if that is his/her choice. The hearings officer makes decisions based on the State Plan, the Rehabilitation Act, VR regulations and state policies. Decisions are provided to the student and RS Director within 30 days of the hearing.

In most situations, if the student is not represented by an attorney during fair hearings or other proceedings, RS will not be represented by an attorney. Exceptions will be made at the discretion of the RS Director. RS Program Administrators may seek consultation or technical assistance from the DCF Legal Department or local office Attorneys prior to the hearings or proceedings if appropriate.

**Review of formal hearings (fair hearings) decisions:** Kansas has established the following procedures for the review of decisions of the fair hearings officer.

- The student or the agency may request a review of the fair hearing decision. The authority for this review is vested in the Secretary of the Kansas Department for Children and Families (DCF), the director of the Designated State Agency. Per Kansas Statute 77-527, the Secretary delegates this authority to the State Appeals Committee. Such authority may not be delegated to RS, the Designated State Unit. Parties may submit additional evidence to the State Appeals Committee through legal briefs or presentation of oral arguments. Appeals committee decisions are presented to the Secretary for review, approval and signature.
- The student or the agency must file a petition for a review of the fair hearing decision within 15 days of the date of the decision, if the decision is delivered in person; or within 18 days of the date of the decision, if the decision is mailed.
- After the request for an impartial review, reasonable time extensions may be granted for good cause.
- The State Appeals Committee reviews the decision of the hearings officer to assure consistency with the State Plan, the Rehabilitation Act, VR regulations, and state policies consistent with federal requirements. Any decision of the fair hearings officer that supports the position of the Pre-ETS student can only be overturned or modified by the State Appeals Committee if there is clear and convincing evidence that the decision of the fair hearings officer was erroneous because it was contrary to the State Plan, the Rehabilitation Act, federal regulations, or state policies that are consistent with federal requirements.
- The decision of the State Appeals Committee/Secretary of DCF must be made within 30 days of receipt of legal briefs and oral arguments. A full written report of the decision and the rationale for the decision is provided to the applicant, eligible student or his/her representative, and to RS.

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**District Court:** The student may bring a civil action for review of decisions by hearings officers or the State Appeals Committee/Secretary of DCF. The civil action may be brought in any State court of competent jurisdiction or in a district court of the United States of competent jurisdiction without regard to the amount in controversy.

In such actions, the court:

- Shall receive the records related to the hearing and the records related to the state review;
- Shall hear additional evidence at the request of a party to the action; and
- Basing the decision of the court on the preponderance of the evidence, shall grant such relief as the court determines to be appropriate.

## [Appeal Rights](#)

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

### Part 14 Confidentiality

#### Protection, use, and release of personal information

Rehabilitation Services (RS) will safeguard the confidentiality of all personal information, including photographs and lists of names. All applicants and students who meet the criteria to participate and, as appropriate, those students' representatives, service providers, cooperating agencies, and interested persons are informed through appropriate modes of communication of the confidentiality of personal information and the conditions for accessing and releasing this information.

All applicants or their representatives are informed about the Pre-ETS need to collect personal information and the policies governing its use, including:

1. Identification of the authority under which information is collected.
2. Explanation of the principal purposes for which Pre-ETS intends to use or release the information.
3. Explanation of whether providing requested information to Pre-ETS is mandatory or voluntary and the effects of not providing requested information.
4. Identification of those situations in which Pre-ETS requires or does not require informed written consent of the student before information may be released.
5. Identification of other entities to which information is routinely released.

An explanation of policies and procedures affecting personal information will be provided to each student in that student's native language or through the appropriate mode of communication.

#### Release to other programs in the Department for Children and Families (DCF)

Pre-ETS staff may release student information without a signed release from the student or parent/guardian (if applicable) to other programs within DCF *on a need-to-know basis*. A signed release is not necessary within DCF since all programs are part of the same state agency.

Pre-ETS staff may release information without a signed release from the student to DCF contractors and service providers on a *need-to-know basis*. Contracts include assurances that the contractors, who are acting on behalf of RS and DCF, will use the information appropriately and maintain confidentiality standards.

If Pre-ETS has obtained personal information about a student from another agency, provider or organization, such information may be released within DCF *on a need-to-know basis*. Restrictions on further release do not apply within DCF since all programs are part of the same state agency. In analyzing "need-to-know," Pre-ETS Transition Specialists shall consider whether entire reports or summary documents should be released, and whether the information is necessary for the purposes of the requesting program.

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## Release to programs outside of DCF

When programs outside of DCF which are not contractors of DCF request personal information, informed written consent of the student is required. Upon receiving the informed written consent of the student or, if appropriate, the student's parent/guardian (if applicable), Pre-ETS may release personal information to another agency or organization for its program purposes only to the extent that the information may be released to the involved student or the student's representative and only to the extent that the other agency or organization demonstrates that the information requested is necessary for its program.

## Release to the Client Assistance Program

Informed written consent is required. If a Pre-ETS Transition Specialist or Manager receives a call or email regarding a concern from the Client Assistance Program (CAP), the Pre-ETS staff needs to inform their Program Administrator (PA). The PA will be working with the concern. The Pre-ETS staff will not communicate with the CAP.

## Requirements for release forms

Pre-ETS has approved release of information forms. Pre-ETS staff may also accept release of information forms from other organizations. Whether using Pre-ETS forms or forms provided by other organizations, the following informed written consent requirements must be met:

- The student's name and identifying information (such as the date of birth or Social Security Number) must be clearly stated.
- The information being requested or released must be specifically identified.
- The person or organization to receive the released information must be specifically identified.
- The purpose for the request or release must be specifically identified.
- The form must be signed, witnessed and dated.
- Specifications of the date, event or condition upon which the release expires must be clearly stated.
- Transition Specialist need to ensure he/she check the release of information forms to ensure they are not expired.

## Release to students who meet the criteria to participate in Pre-ETS services

If requested in writing by a student, Pre-ETS shall release all requested information in that student's record of services to the student or the student's representative in a timely manner. Release may occur by making the record of services available to the student to view, or by providing copies of information in the record of services, according to the student's informed choice.

## There are two exceptions:

1. *Release of information that may be harmful to the student:*
  - Medical, psychological, or other information that Pre-ETS determines may be harmful to the student may not be released directly to the student. However, this information must be provided to the student through a third party chosen by the student. The third party may include, among others, an advocate, a family member, or a qualified medical or

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mental health professional, unless a representative has been appointed by a court to represent the student, in which case the information must be released to the court-appointed representative.

- In such circumstances, Pre-ETS Transition Specialist s will inform the student and/or the student's representative that specific records contain information which requires professional explanation and interpretation, and in the Pre-ETS Transition Specialist's judgment, review by or release directly to the student would not be in the student's best interests.
- Pre-ETS Transition Specialist should discuss the option of having the student authorize release of the information to a physician or psychologist to facilitate interpretation of the information. If the student agrees with this approach, the Pre-ETS Transition Specialist may assist the student in arranging such a meeting with the health care professional and in paying for it. If the student does not agree with this option, the Pre-ETS Transition Specialist shall proceed in a timely manner to release the information to the student's representative.
- *Note regarding release of such information to other programs:* Medical or psychological information that Pre-ETS determines may be harmful to the student may be released to another program if the student has provided an informed written consent and if the other program assures Pre-ETS that the information will be used only for the purpose for which it is being provided and will not be further released to the student.

## 2. *Further release of information that has been obtained from another agency or organization*

If Pre-ETS has obtained copies of personal information, such as medical/psychological assessments, exams or services, then such information may be released only by, or under the conditions established by, the other agency or organization.

### **Release of information forms – Refer to Forms Part 67**

Release of information to VR

Release of information to School

Permission for Pre-ETS to release information

Permission for Pre-ETS to obtain information from other entities

Release of information to coordinate services

### **Fees for copies provided by RS**

Pre-ETS may establish reasonable fees to cover extraordinary costs of duplicating records or making extensive searches. Questions on current fees should be directed to the Administration Office.

### **Amending the record of services**

An applicant or student who believes that information in his or her record of services is inaccurate or misleading may request that Pre-ETS amend the information. If the information is not amended, the request for an amendment must be documented in the record of services.

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## Release to authorities

Informed written consent (a signed release of information form) is not required in the following circumstances:

- Pre-ETS shall release personal information if required by Federal law or regulations. Questions about this standard should be addressed to the Department for Children and Families (DCF) Attorney in the local office at the time a request for release is received.
- Pre-ETS shall release personal information in response to investigations in connection with law enforcement, fraud, or abuse, unless expressly prohibited by Federal or State laws or regulations, and in response to an order issued by a judge, magistrate, or other authorized judicial officer.
- Pre-ETS also may release personal information in order to protect the student or others if the student poses a threat to his or her safety or to the safety of others.

## State program use

All personal information in the possession of RS must be used only for the purposes directly connected with the administration of the Pre-ETS and vocational rehabilitation programs. Information containing identifiable personal information may not be shared with advisory or other bodies that do not have official responsibility for administration of the program.

## Release for audit, evaluation, and research

Personal information may be released to an organization, agency or individual engaged in audit, evaluation, or research only for purposes directly connected with the administration of the Pre-ETS or vocational rehabilitation programs, or for purposes that would significantly improve the quality of life for participants and only if the organization, agency, or individual assures that:

- The information will be used only for the purposes for which it is being provided.
- The information will be released only to persons officially connected with the audit, evaluation, or research.
- The information will not be released to the involved student.
- The information will be managed in a manner to safeguard confidentiality.
- The final product will not reveal any personal identifying information without the informed written consent of the involved student or the student's representative.

*Information in this Part is based on 34 CFR 361.38 and DCF guidance.*

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PART Miscellaneous Administrative Issues

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

### Part 15 Miscellaneous Administrative Issues

#### Non-discrimination

All services shall be provided without regard to sex, race, age, creed, color, national origin or type of disability.

#### Reporting Child Abuse and Neglect

Pre-ETS staff who have reason to suspect that a child has been injured as a result of physical, emotional, or sexual abuse or neglect shall report such situations. Reason to suspect means that there is credible evidence or a discrepant or inconsistent history in explaining a child's injury.

Reporting is a request for an assessment into the condition of a child. The determination of whether abuse or neglect has actually occurred is the responsibility of DCF or appropriate law enforcement agencies. The report may be made orally and followed by a written report if requested by DCF or law enforcement agencies. Reports should include the name and address of the child, the child's parents or other individuals responsible for the child's care; the child's location; the child's condition, including the nature or extent of the injury; whether the alleged perpetrator has access to the child; and any other helpful information.

Reports should be made by calling the Kansas Protection Report Center at 1-800-922-5330. There is also an on-line reporting form and more information available at:

<http://www.dcf.ks.gov/services/PPS/Pages/KIPS/KIPSWebIntake.aspx>

If there is an emergency situation, call your local law enforcement agency or 911.

#### Synopsis of State of Kansas Workplace Violence Policy

The safety and security of State of Kansas employees and customers are very important. Threats, threatening behavior, acts of violence, or any related conduct which disrupts the organization's ability to execute its mission will not be tolerated.

Any person who makes threats, exhibits threatening behavior, or engages in violent acts on state-owned or leased property may be removed from the premises pending the outcome of an investigation.

Threats, threatening behavior, or other acts of violence executed off state-owned or leased property but directed at state employees or members of the public while conducting official state business will not be tolerated. Off-site threats include, but are not limited to, threats made via the telephone, fax, electronic or conventional mail, or any other communication medium.

Violations of this policy may lead to barring the individual from state-owned or leased premises, termination of business relationships with that individual, and/or prosecution of the individual.

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Employees are responsible for notifying the local area management of the Kansas Department for Children and Families (DCF) and Rehabilitation Services (RS) Administration Office of any threats that they have witnessed, received, or have been told that another person has witnessed or received.

*Reference: Workplace Violence Policy, Kansas Department of Administration, March 4, 2016*

## **Kansas Workplace Violence Policy Rehabilitation Services (RS) Policy**

When a student demonstrates by past or present actions that they pose a threat to Pre-ETS staff, they have forfeited the right to receive Pre-Employment Transition Services (Pre-ETS) with vocational rehabilitation (VR). The Statewide Pre-Employment Transition Services Program Administrator in the RS Administration Office should be consulted in all such cases before taking any actions.

1. If there is an open case, the case should be closed as "Other." The student should be notified in writing of the closure, the reason for the closure (the student's behavior which was identified as violent or threatening), the State's workplace violence policy, and the standard rights to appeal.
2. Requests to open new cases or reopen previously closed cases should be assessed very carefully. The student must provide independent evidence that they have received services or therapy to address the previously identified violent or threatening behavior. It is the student's responsibility to provide such evidence. Independent sources for such evidence and evaluation may be a psychiatrist, psychologist, medical doctor, or other professional whom the counselor deems qualified to assess such situations. Participation in such services or therapy alone does not equate to meet the criteria to participate in Pre-ETS. The student would still have to be determined to meet criteria according to the standard policies and procedures. If a case is not opened or reopened, the student should be notified in writing of the Pre-ETS decision, the reason for the action, the State's workplace violence policy, and the standard rights to appeal.



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### Part 16 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 includes KYEA, Centers for Independent Living and Staffing Agency. This category also includes sign language interpreters.*