



## Time Allocation Guide for Pre-Employment Transition Services

Staff time should only be counted when providing pre-employment transition services to students with disabilities. In (insert state Agency name), the age range for a student with a disability is (insert age range) years of age.

VR agencies are not permitted to pay any administrative costs, as defined in section 7(1) of the Rehabilitation Act and §361.5(c)(2)), such as the salaries for the VR counselor's clerical assistant or supervisor, with the funds reserved for the provision of pre-employment transition services. Staff time for the purposes of this guide pertain to those individuals employed by the VR agency who directly provide pre-employment transition services.

### **1. Direct Services/Required Activities** (as outlined in 34 CFR 361.48(a)(2)):

#### **a. The five "required" activities of pre-employment transition services are:**

- Job exploration counseling;
- Work-based learning experiences, which may include in-school, after school, or community-based opportunities;
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at IHEs;
- Workplace readiness training to develop social skills and independent living; and
- Instruction in self-advocacy, including peer mentoring.

#### **b. Tracking staff time for directly providing or arranging for the provision of one or more of the five required pre-employment transition services activities directly toward the required activities:**

- Staff will document the time spent directly providing the required pre-employment transition service activities.  
*Note: The specific pre-employment transition services the student receives would be tracked in the student's case record, through the agency's case management system.*
- This can include staff travel time.
- Staff may also document the time spent arranging for the provision of pre-employment transition services.
- This may include time spent working with the student and providers to identify and arrange the pre-employment transition service(s) that best meet the student's needs.

**Example A:** If the counselor is providing job exploration counseling off site from 1:00-2:00 pm and they left the VR office at 12:30 to travel to the site and returned at 2:30 from providing the service, then they would document 2 hours of staff time providing pre-employment transition services.

*Note that if the counselor spent an additional hour meeting with this student or another to discuss any other service (other than pre-employment transition services), that additional time cannot be counted as pre-employment transition services time.*

**Example B:** If the counselor spent an hour researching providers and coordinating availability of pre-employment transition services for the student, the counselor would then document 1 hour of staff time arranging for the provision of pre-employment transition services.

## **2. Coordination Activities** (as outlined in 34 CFR 361.48(a)(4)):

### **a. Pre-employment transition coordination consists of:**

- Attending individualized education program meetings for students with disabilities, when invited;
- Working with the local workforce development boards, one-stop centers, and employers to develop work opportunities for students with disabilities, including internships, summer employment and other employment opportunities available throughout the school year, and apprenticeships;
- Working with schools, including those carrying out activities under section 614(d) of the IDEA, to coordinate and ensure the provision of pre-employment transition services;
- When invited, attending person-centered planning meetings for individuals receiving services under title XIX of the Social Security Act (42 U.S.C. 1396 et seq.);

### **b. Tracking staff time for coordination activities:**

- Staff will document the time they spend conducting these four specific coordination activities, which may also include their travel time to and from the coordination activities.

**Example:** if the counselor attended four IEP meetings for students with disabilities from 9:00 am to 12 noon, the counselor could document 3 hours under pre-employment transition services as a coordination activity.

*Note that if the counselor was at the high school until 1pm discussing other students*

*receiving other additional VR services, they would not be able to charge that additional one hour to pre-employment transition services.*

**3. Authorized Activities** (as outlined in 34 CFR 361.48(a)(3)):

- a. The authorized activities are those pre-employment transition services that may be provided only after a state has determined that funds remain after provision of the required and coordination activities.**

**Choose one of the following statements:**

A. (Insert state agency name) is not currently tracking staff time toward any of the authorized activities.

**or**

B. (Insert state agency name) is currently providing the following authorized activities: (customize by selecting only those activities your agency is currently providing)

- These authorized activities include:
  - implement effective strategies that increase independent living and inclusion in their communities and competitive integrated workplaces;
  - develop and improve strategies for individuals with intellectual and significant disabilities to live independently, participate in postsecondary education experiences, and obtain and retain competitive integrated employment;
  - provide training to vocational rehabilitation counselors, school transition staff, and others supporting students with disabilities;
  - disseminate information on innovative, effective, and efficient approaches to implement pre-employment transition services;
  - coordinate activities with transition services provided by local educational agencies under IDEA;
  - apply evidence-based findings to improve policy, procedure, practice, and the preparation of personnel;
  - develop model transition demonstration projects;
  - establish or support multistate or regional partnerships that involve States, local educational agencies, designated State units, developmental disability agencies, private businesses, or others; and
  - disseminate information and strategies to improve the transition to postsecondary activities of those who are traditionally unserved.

**b. Tracking staff time for authorized activities:**

- Staff will document the time they spend carrying out (specify which) authorized

activities identified in the Rehabilitation Act, as amended by WIOA.

**Example:** Staff will track the time spent preparing and providing staff training to VR and ED staff on supporting students with disabilities. Counselor X spent 5 hours preparing for and conducting this training workshop for LEA staff about students with disabilities on self-advocacy and independent living, including financial literacy. The counselor's time to develop the materials can be reported as an “authorized” activity, for pre-employment transition services. *Note: Clerical time may not be charged to provision of pre-employment transition services because their time meets the definition of “administrative costs” which is not an allowable charge to pre-employment transition services.*

#### 4. All Other Activities and Services Provided:

Guidance for charging costs toward the minimum 15% reservation of funds for pre-employment transition services is provided in accordance with the [Notice of Interpretation](#) (Federal Register / Vol. 85, No. 40 / Friday, February 28, 2020 / Rules and Regulations)

##### a. Potentially Eligible Students with Disabilities

- Agencies may charge the staff time spent only on pre-employment transition services outlined under 34 C.F.R. 361.48(a), and
- Time spent providing or arranging for the auxiliary aids and services needed by those students to access or participate in pre-employment transition services

##### b. Eligible VR Students with Disabilities under an IPE

- Agencies may charge the staff time spent on the pre-employment transition services outlined under 34 C.F.R. 361.48(a), and
- Time spent providing or arranging for the auxiliary aids and services needed by those students with disabilities to access or participate in pre-employment transition services, and
- Certain other VR services in section 103(a) of the Rehabilitation Act and 34 CFR 361.48(b) needed by those eligible students to benefit from pre-employment transition services in accordance with an approved IPE.

##### c. The following are examples of activities that staff would not track their time as pre-employment transition services:

- General case management activities for all other VR services including transition services
- Providing or arranging other VR services not needed by students to benefit from pre-employment transition services such as:
  - Transition Related Services
  - Medical Services
  - Employment-Related Services



- Vocational and other training Services
- Job development and placement services

*Questions or inquiries on tracking staff time should be directed to (insert appropriate staff member or designee).*

*This guide was developed by the WINTAC, a project funded under # H264G15005 of the U.S. Department of Education (Department). The information contained in this document does not necessarily reflect the position or policy of the Department and no official endorsement should be inferred.*