FAQs Pre-employment transition services

1. Can the cost of "travel training" for a student with a disability be considered an allowable charge to the funds reserved as a service under Workplace Readiness Training?

   Yes, "travel training" would be appropriate under the required activity of workplace readiness training. Travel training is similar to Orientation & Mobility (O& M) training in that O&M is a service provided to individuals who are blind or visually impaired, while travel training is provided as a similar service to other individuals with disabilities who may need this type of training. Examples of travel training may include the preparation of a student with a disability to travel independently in their home, community, college, work based learning site, etc.

2. Can Drivers Education be considered part of a workplace readiness curriculum and the costs charged to the funds reserved for pre-employment transition services?

   This would not be an appropriate cost to be charged to the reserve as drivers education is an individualized VR service that must be provided under an IPE. Agencies are encouraged to reach out to RSA if they feel they have an exception that should be considered.

   Agencies should note that while drivers education would be considered a VR service and not an allowable pre-employment transition services, workplace readiness training could include curriculum that covered a general or broad discussion of the types of things students need to consider if they would look to obtain a license, versus other methods of transportation.

3. Are State VR Agencies (SVRAs) required to separately track the time VR staff spend carrying out the four coordination activities outlined in 361.48(a)(4)?

   For the purposes of reporting on the SF 425, when SVRAs report their expenditures for pre-employment transition services (pre-ets), they must include both the expenditures for purchased services (this would also be tracked in the RSA 911 as it captures the specific costs per required pre-ets activity and per student for purchased services), as well as the costs incurred from staff time providing or arranging for the required, authorized, and coordination activities outlined in 34 CFR 361.48(a). The amount reported on the SF 425 is the sum of these expenditures. Agencies must have sufficient internal controls in place to accurately track the time staff spent for each of the services outlined in 34 CFR 361(a)(2),(3), and (4).

   In order to determine whether or not the agency has sufficient funds remaining to move on to authorized pre-ets services, the agency will need to have forecasted the amount of resources expended on the required and coordination pre-ets activities. In order to do this, agencies will need to ensure they can account for costs associated with the time staff spend on the required pre-ets activities, the 4 coordination pre-ets activities, as well as the authorized pre-ets activities if applicable. While the SF 425 currently requires agencies to report the total pre-ets expenditures and does not require agencies to separate the amount spent on each of the three categories under 34 CFR 361.48(a), agencies must still have sufficient policies and procedures in
place to ensure that they can identify the specific authority within the regulations that permit them to assign the cost charged to the funds reserved.

4. When VR pays a student a stipend, what must that stipend be based upon in order for the VR agency to allocate those funds toward the reserve?

The stipend should be that of the prevailing wage. If it is in a non-paid experience, the use of a stipend would be allowable and should be equivalent to that of what wage a person without a disability would make for the same type of work. A stipend for pre-employment transition services may only include those allowable costs under section 113 and 361.48(a)(2) and may not include unallowable costs for the reserve such as maintenance and transportation expenses.

5. Can VR impose a minimum age requirement to apply for VR services since students with disabilities may receive pre-employment transition services without applying for VR?

There is nothing in the statute or regulations that permit the VR agency to deny a VR application based upon a minimum age. The VR agency should take all applications regardless of age and regardless if the student has participated in or is currently receiving pre-ETS. 34 CFR 361.42 (2)(A) list the prohibiting factors in the assessment for determining eligibility and priority of services which include age.

6. If a student has started receiving pre-employment transition services, then applies for VR and is found ineligible, can that student complete the pre-employment transition services they are involved in or must those services stop immediately?

Once a student has been determined ineligible for VR services, they would no longer be able to receive pre-employment transition services because they are no longer potentially eligible.

7. Could a student with a disability who was previously determined eligible and had their case closed, receive pre-employment transition services?

A student with a disability who was previously determined eligible and their case had been closed, could return at a later date and be considered potentially eligible and receive pre-employment transition services as long as they meet the definition of a student with a disability.

Nothing in the statute would prohibit them from returning as potentially eligible, unless the individual had been determined ineligible.

8. When is the service record of a student with a disability who receives pre-employment transition services considered "closed"?

For a student with a disability who solely received pre-employment transition services and who has not applied or been determined eligible to receive other VR services, the service record is “closed” when the student is no longer receiving such services.
as indicated in the pre-employment transition services data elements included in the RSA-911-16 Manual (see section X, page 51).

Codes were added to the pre-employment transition service data elements to enable agencies to report when those services are no longer being provided. However, if a student with a disability has applied and been determined eligible for VR services, the student's service record would be "closed" when the student satisfies the definition of "exit" at 34 CFR 361.150(c) because his or her service record is closed pursuant to 34 CFR 361.43 or 361.56. States will need to ensure their written policies include this guidance.

9. How should states code auxiliary aids and services for pre-employment transition services?

VR agencies may pay for auxiliary aids and services with funds reserved for the provision of pre-employment transition services, if the auxiliary aids and services are directly related to one of the five required activities outlined in §361.48(a)(2). These expenses must be incurred as a result of the provision of one of the five required activities outlined in §361.48(a)(2), to be charged to the reserve.

Allowable costs incurred from the provision of the five required activities outlined in §361.48(a)(2), must be recorded in the RSA-911. These costs would be recorded in the appropriate service element in section X of the RSA-911. For example, if the VR agency provided a staff member to serve as an interpreter for a student to participate in a work based learning experience, the cost of the interpreter would be recorded under RSA-911 data element 103, Work Based Learning Experience, Service Provided by VR Agency Staff. If the VR agency contracted with a third party to provide an interpreter for a student to participate in a self-advocacy workshop, the cost of the interpreter would be recorded under RSA-911 data element 122, Instruction in Self Advocacy, Service Provided by VR Agency Purchase.

Allowable costs incurred from the provision of the five required activities outlined in §361.48(a)(2), for students who have been determined eligible and placed on an IPE must be recorded in the RSA-911. These costs would be recorded in the appropriate service element in section X of the RSA-911. If the VR agency used the same contracted interpreter for the student to participate in a VR activity other than one of the five required activities outlined in §361.48(a)(2), the cost of the interpreter may not be charged to the funds reserved for the provision of pre-employment transition services. The costs would be recorded in RSA-911 data element 330, Interpreter Services, Services Provided Through VR Agency Purchase.

10. Can clarification be provided regarding Project Search and allowable costs for the reserve funds? Particularly, can funds reserved be used to pay for the site licensing fee?

As states are looking at the services provided in a Project Search program, they must analyze each activity and cost to see if it fits within the scope of the five required pre-employment transition services and whether or not each service within the Project Search site aligns, and the service is solely provided to students with disabilities meeting the definition. If a service within the Project Search site aligns with one of the five required services and is provided solely to students with disabilities, then the cost of that service may be charged to the funds reserved. However, if the service is considered a VR service under 34 CFR 361.48(b), or was provided to an individual who does not meet the definition of a student with a
disability, then that service would only be able to be provided to an eligible VR participant under an IPE and the costs would not be able to be charged to the funds reserved.

The site licensing fee would not be an allowable cost to charge to the funds reserved for pre-employment transition services because that would be considered an administrative cost, which cannot be charged to the funds reserved.

One example of a cost that may be allowable would be for an onsite worksite trainer who would be providing general workplace instruction. However, if that trainer was providing one on one job coaching services to address the individual’s unique needs related to their disability, that would not be able to be charged to the funds reserved for pre-employment transition services and the student would need to apply for VR services and be determined eligible and have that service identified on their Individualized plan for employment.

11. Are assessments an allowable pre-employment transition services expenditure?

Although DSUs or VR agencies may provide interest inventories as a pre-employment transition service under job exploration counseling, assessment services to determine eligibility or priority for services, or determining VR needs are services for individuals who have applied or been determined eligible for VR services under 34 CFR §361.48(b). DSUs are not to use the pre-employment transition services required activities as assessment services for the purpose of determining whether additional vocational rehabilitation services are needed, or if the individual will be successful in employment (81 FR 55695). Assessments other than interest inventories would not be allowable expenditures as required, authorized or coordination activity under pre-employment transition services. However, the DSU could perform these assessments, if the student were to apply for VR services, pursuant to section 103(a) of the Rehabilitation Act and 34 CFR 361.48(b) with other VR funds.

12. May a VR program that has expended its minimum 15% reserve requirement, regardless of whether or not they are under an order of selection, restrict access to pre-employment transition services by potentially eligible students with disabilities as a result of a lack of resources (e.g. money, staff time)?

While an order of selection acts as a mechanism for the VR program to regulate the flow of individuals that can be served with the agency’s resources, there is no such mechanism in the statute or regulations for pre-employment transition services. VR programs are encouraged to examine the ways that they are providing pre-employment transition services to see if they can utilize strategies or delivery methods that are more cost effective to meet the needs of students with disabilities in their service area.

13. Can a VR agency use reserve funds to pay for costs of interpreters of foreign language for students with disabilities participating in pre-employment transition services required activities?
Foreign language interpreters are not an auxiliary aid or service that is required due to the individual's disability in order for a student with a disability to access or participate in pre-employment transition services and therefore would not be a cost that would be able to be charged toward the reserve.

14. What methodologies would RSA consider consistent with the SF 425 financial reporting requirement to ensure that VR staff time is only spent on pre-employment transition services?

In the FAQ that RSA published entitled "Frequently Asked Fiscal Questions - Pre-Employment Transition Services", it was clarified that because of the statute that administrative costs may not be allowed under the reserve the amount of costs, only direct time may be charged to the reserve and thus time averaging or similar methods are unacceptable. Rather, agencies should allocate costs for the positive time reported by staff in the direct provision of Pre-Employment Transition Services. In other words, staff need to ensure they are documenting real time, not an average, estimate, sampling, or any other methods other than the direct tracking of staff time, as any other method would not ensure that unallowable costs would not be charged to the funds reserved. This is different than most grant awards because of the administrative cost prohibition. The only way to demonstrate that administrative costs are not being charged is through the positive reporting of actual staff time.

15. Once a student has been determined eligible for VR services, are the pre-employment transition services the student receives required to be included on the IPE, or do states have the option of providing pre-employment transition services without including them on the IPE so long as they document the services the student is receiving?

The pre-employment transition services would need to be included on the individual's IPE. Under 361.46, the listed required content describes that the IPE must list all of the services the individual needs in order to achieve an employment outcome. As these students with disabilities are now under a plan, this requirement will need to be satisfied. Even for those students with disabilities who may use a projected post school employment outcome and the plan includes only those services to assist in refining that employment goal, any pre-employment transition services the student would receive would still need to be included. Agencies are directed to refer to the discussion on page 55690 found in the preamble.

16. Is a student with a disability considered "enrolled in a recognized education program" if the student has exited secondary education, and was admitted or accepted into a postsecondary program but their program start date is delayed or deferred for various reasons including the rapidly growing trend of formalized "gap year" programs. How should the VR agency determine whether or not the individual meets the definition of a student with a disability?

Prior to answering this question formally, it is important to remember that students can still receive pre-employment transition services in the summer between HS and college. As far as those students who may be taking a "gap year or semester," the agency will need to demonstrate that the student with a disability is indeed enrolled in a recognized education program. The length of time or gap is not the issue. There are four pieces of documentation needed:

- [List of documentation required]
1. Documentation that the individual with a disability graduated from secondary education;
2. Documentation that the individual with a disability has been accepted into a post-secondary ed. institution/program;
3. Documentation of the individual with a disability intention or confirmation that they had accepted the invitation to enter the post-secondary program; and
4. Documentation that the individual with a disability has been informed by the institution that their “seat” or “spot” is being held for them.

17. Regarding the use of funds reserved for the provision of pre-employment transition services for staff travel costs: specifically, can VR include lodging and meals to the reserve funds for those staff who are traveling to directly provide the required activities under pre-employment transition services to students with disabilities.

As clarified in the preamble to the final regulations, travel costs incurred directly as a result of providing VR services constitute service-related costs, not administrative costs for the purposes of the VR program. As such, VR agencies may use funds reserved for the provision of pre-employment transition services to pay for those travel costs incurred as a direct result of providing pre-employment transition services, including lodging and meals if necessary to directly provide pre-employment transition services to students with disabilities that are proportional to the time spent directly providing or arranging for the provision of pre-employment transition services. However, to the extent the VR counselor or partner is performing other duties as well, the VR agency is not permitted to charge the portion of travel costs, etc., for those other activities, to the funds reserved for the provision of pre-employment transition services. Therefore, when considering whether the VR counselor or partner is only providing pre-employment transition services to students with disabilities, it is important to consider that a student receiving pre-employment transition services may also be receiving other VR services (other than pre-employment transition services) and as such, would be under a different cost objective and such costs would not be permissible with the funds reserved for the provision of pre-employment transition services.

It is also important to note that 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. Any administrative costs that are associated with a contracted partner or trainer, who does not directly provide pre-employment transition service required activities, but arranges for the provision of those services, may not be paid with funds reserved for the provision of pre-employment transition services.

If the partner providing the training is not a VR counselor, but is a contracted position, it will be important for VR agencies to require the partner or trainer, as part of the contract, to maintain proper internal controls to ensure the proper accounting of the individual’s time in order to ensure accurate cost allocation and accounting of funds.

Finally, while section 110(d)(2) of the Act and §361.65(a)(3)(ii)(B) restrict pre-employment transition services reserve funds from being used to pay for administrative costs associated with the provision of such services or any VR service, this provision is not applicable to contracts for the direct provision of
purchased pre-employment transition services. Therefore, administrative costs associated with the direct provision of required pre-employment transition services purchased through a contract, which are reasonable, necessary and allocable to the provision of the required activities, may be paid with reserve funds.

18. Is it necessary for the VR program to obtain documentation of a disability at the individual level for a potentially eligible student?

Yes

Would the report of the Special Education staff be sufficient for the purposes of delivering pre-employment transition services?

Although much less documentation is required with respect to students with disabilities who are receiving pre-employment transition services prior to applying or being determined eligible for VR services, some basic documentation is necessary to ensure that: (1) these students indeed have a disability and, thus, are "potentially eligible" for VR services; and (2) the DSU has sufficient information necessary for it to complete the RSA-911 Case Service Report, and satisfy performance accountability requirements under section 116 of WIOA. To that end, the data elements required for a student with a disability who is receiving pre-employment transition services and has not applied for or been determined eligible for VR services include: a unique identifier, social security number (if available), date of birth, race (required if student is in elementary or secondary education), ethnicity (required if student is in elementary or secondary education), student's disability, start date of pre-employment transition services and the pre-employment transition services provided, including the type of provider and amount expended for the service. The requirements in 34 CFR 361.47 and 34 CFR 361.56, taken together, require VR agencies to maintain verifying documentation in an individual's case file. It is important to note that the use of an electronic case management system, does not remove the requirement for an agency to maintain either hard copies or scanned copies of required supporting documentation in the individual's service record. RSA will maintain a table that lists the RSA-911 supporting documentation requirements on RSA's website.

Supporting documentation, relevant to the above-identified required documentation, may include:

- Case note documenting counselor observation, review of school records, statements of education staff; or
- Referral form for pre-employment transition services with the identification of a student's disability, signed by school staff and parent/guardian if the student is under the age of majority in a State (parental consent to participate in pre-employment transition services is governed by State law, as well as policies of the educational programs and the DSU); or
- Copy of an individualized education program (IEP) document, SSA beneficiary award letter, school psychological assessment, documentation of a diagnosis or disability determination or documentation relating to 504 accommodation(s).
19. Can VR pay for the cost of an assessment to determine whether or not a potentially eligible student with a disability meets the definition of a student with a disability for the purposes of section 504 when there is no documentation available?

No. An assessment to determine whether a student meets the definition of a "student with a disability" is beyond the scope of pre-employment transition services described in section 113 of the Rehabilitation Act and 34 CFR 361.48(a) of its implementing regulations. Therefore, costs for such assessments could not be paid with funds reserved for the provision of pre-employment transition services. However, the DSU could perform these assessments, if the student were to apply for VR services, pursuant to section 103(a) of the Rehabilitation Act and 34 CFR 361.48(b) with other VR funds.

20. Do states need to conduct the needs assessment and do the fiscal forecasting and activities outlined in the final rule prior to using reserve funds on pre-employment transition coordination activities outlined in section 113(d) and 361.48(a)(4) like they are required to do prior to using the authorized services?

Pursuant to section 113(b) and (d) of the Rehabilitation Act and 34 CFR 361.48(a)(2) and (4), the State must use funds reserved in accordance with section 110(d)(1) of the Rehabilitation Act and 34 CFR 361.65(a)(3) to provide "required" pre-employment transition services and coordination activities related to those pre-employment transition services. If funds remain after the provision of these services, the State may expend remaining reserved funds on those "authorized" pre-employment transition services described in section 113(c) of the Rehabilitation Act and 34 CFR 361.48(a)(3). In order for a State to know whether and how much of the reserved funds will remain for the provision of "authorized" pre-employment transition services, it will be necessary for the DSU to determine the estimated amount of funds needed to provide the "required" and coordination activities. Once the amount needed for these activities is determined, the agency will know the amount of reserved funds remaining that can be expended for "authorized" activities (slide 38 RSA regional training). During the RSA regional trainings, it was clarified that required, authorized and pre-employment transition coordination activities may be provided or arranged for concurrently, so long as an agency can demonstrate that it identified the number of potential individuals eligible for pre-employment transition services, and the funds necessary to provide the required activities.

Pre-employment transition coordination activities are necessary for the implementation of such services and are not optional. Pre-employment transition coordination activities are very closely aligned with the coordination and provision of the actual "required" activities. Please see page 55695 of the preamble to the final regulations (pdf format) for a discussion of transition coordination activities.

21. Can you please clarify whether or not a student can complete all pre-employment transition services needed or only the service they started once they apply for VR and are subject to the states Order of Selection (OOS)?

The information provided in the Sacramento RSA regional meeting is correct. If a student with a disability begins one or more of the required activities prior to being determined eligible for VR services, he or she may continue to receive any and all pre-employment transition services even if the student is assigned to a closed OOS
22. When an employer requires a potentially eligible student come prepared for a WBL with steel-toed shoes or other such items, can VR use reserve funds and pay for these expenses necessary for the student to participate.

As discussed during the RSA regional trainings, funds reserved in accordance with section 110(d) of the Rehabilitation Act, must be used solely to pay for those costs incurred in the provision of pre-employment transition services as itemized in section 113 of the Rehabilitation Act and VR program regulations in §361.48(a). VR agencies will need to analyze each cost to determine whether it: (1) fits within the scope of the itemized pre-employment transition services activities; and (2) was incurred solely for the benefit of a "student with a disability."

It is permissible for VR agencies to reimburse an employer for costs incurred to provide a work-based learning experience, or to pay a fee charged by the employer that might include the cost for the purchase of additional uniforms for a student, or other costs incurred that are not individualized in nature but are necessary for the participation in the work-based learning experience (RSA regional training slide 23). Furthermore, clarification was provided during the RSA regional trainings that should a student with a disability need more individualized transition services, VR services or supportive services under section 103(a) of the Rehabilitation Act and §361.48(b), he or she would need to apply for and be determined eligible for VR services, and have an approved IPE to receive those services funded with non-reserved title I funds. As such, an individual would need to apply for and be eligible for VR services in order to receive these items because such costs would constitute "maintenance," which is an individualized service that must be provided in accordance with an IPE pursuant to section 103(a) of the Rehabilitation Act and 34 CFR 361.48(b). "Maintenance," as a VR service, goes beyond the scope of the provision of the work-based learning opportunity as a pre-employment transition service.

23. Is a transition coordinator considered an allowable pre-employment transition service expenditure?

The portion of a transition coordinator's time that is spent on directly providing or arranging for the provision of pre-employment transition services, is an allowable expenditure from the funds reserved for the provision of pre-employment transition services. However, no administrative costs (as defined in section 7(1) of the Rehabilitation Act and 34 CFR 361.5(c)(2)) or other services could be paid with the funds reserved for the provision of pre-employment transition services. Transition coordinators performing other duties will not be able to charge time and costs for those other activities to the funds reserved for the provision of pre-employment transition services. It will be important for the DSU to maintain proper internal controls to ensure the proper accounting of the individual's time in order to ensure accurate cost allocation and accounting of funds.
24. If a state has a student with a disability in a post-secondary program under an IPE and are receiving other VR services to achieve their employment goal and they are participating in a pre-employment transition service such as a workplace readiness training to address soft skills, can they still charge the provision of that workplace readiness skills training to the reserve requirement?

A student participating in a postsecondary education program under an IPE, may continue to receive any of the five required pre-employment transition services for which the allowable costs may be charged to the 15 percent reserve and expend requirement, so long as the student satisfies the definition of a "student with a disability." As such, pre-employment transition services can be provided while a student is receiving VR services under an approved IPE paid for with non-reserved funds or comparable benefits.

25. Can you clarify the interpretation of "in an educational setting" and whether the inclusion of trade schools and training programs such as those at a CRP where a student may earn a certificate are allowable?

Educational programming under the definition of a "student with a disability," would include programs that provide a recognized credential of education, such as a certified nursing assistant (CNA) program. However, programs provided by a CRP or Project Search, would not be considered an educational program for the purposes of satisfying "educational programming" within the definition of a student with a disability.

26. Definition of a student with a disability:

a. Can you clarify whether or not a student who exits high school, meets the required age range and is enrolled in postsecondary education, would continue to meet the definition of a "student with a disability" for purposes of receiving pre-employment transition services the summer before postsecondary education classes begin?

To clarify, a student who graduates or exits from secondary education; meets the minimum and maximum age requirements as set forth in section 7(37) of the Rehabilitation Act of 1973, as amended (the Act) by the Workforce Innovation and Opportunity Act (WIOA), and VR regulations 34 CFR 361.5(c)(51); and is enrolled in post-secondary education for whom classes will begin after summer break, would continue to be considered a student with a disability. Students with disabilities may receive pre-employment transition services until they are no longer enrolled or participating in postsecondary education and no longer meet the statutory and regulatory age requirements.

b. Would a student need to be accepted into a postsecondary education program to be considered enrolled in postsecondary education?

To address your second question, if a student with a disability has not been accepted into an educational program, including postsecondary education, upon exit from secondary education, they would not be considered to be enrolled or participating in an educational program. As such, the individual would be considered to be a youth with a disability. Although youth with
disabilities cannot receive pre-employment transition services, they may receive similar services, such as transition services or other VR services after applying to and being determined eligible for VR services, and under an approved individualized plan for employment (IPE). If a youth with a disability enrolls in or begins participating in an educational program, while they still meet the statutory and regulatory age requirements of a "student with a disability", they would be permitted to begin pre-employment transition services under section 113 of the Act.

27. Can you provide additional guidance regarding how a State is to report students who drop out of and re-enroll in an educational setting and if pre-employment transition services are to stop each time a student drops out of an educational program.

For each pre-employment transition service category (i.e., Job Exploration Counseling, Work Based Learning Experiences, Counseling on Enrollment Opportunities, Workplace Readiness Training and Instruction in Self Advocacy), there are six potential data elements to report. These elements record how the service was provided, the type of service provider and the amount expended for the service. These data elements must be reported for all students receiving pre-employment transition services, including VR applicants and those determined eligible for VR services. If any of the categories of service are being received by a student, the appropriate code values must be included with each data submission. VR agencies are required to report the date that the student with a disability started receiving pre-employment transition services. When reporting that a pre-employment transition service is no longer being provided, code value 2 must be entered in the quarter in which the services are discontinued, regardless of when payment for the services is made. RSA posted a FAQ specific to the RSA-911 and reporting requirements available at Frequently-Asked Questions, which may be helpful to the WINTAC, our grantees and stakeholders, as it relates to the data that needs to be reported for students receiving pre-employment transition services.

28. Can you clarify whether or not interpreter or reader services, or accessible information materials necessary to ensure equal access could be provided not only during work-based learning experiences, but also during any of the required pre-employment transition services?

In an effort to provide guidance to States with respect to the costs that could potentially be incurred in the provision of pre-employment transition services, RSA posted a PowerPoint presentation, titled Transition of Students and Youth with Disabilities from School to Postsecondary Education and Employment. In that guidance, RSA gave examples of the types of costs that could be paid for with the reserved funds when providing pre-employment transition services to students with disabilities. Specifically, in response to public requests for examples of potentially allowable costs while an individual was participating in a work-based learning experience, RSA communicated that interpreter or reader services or accessible informational materials necessary to ensure equal access to the work-based learning experience, as required by the Americans with Disabilities Act of 1990 (ADA), as revised by the ADA Amendments Act of 2008, and section 504 of the Rehabilitation Act, could be paid by the VR agency with reserved funds. To clarify, if an interpreter, reader or accessible informational materials are necessary for the purposes of providing any of the five required pre-employment transition services, they may be
allowable if not customarily provided by another entity, including local educational agencies.

To further clarify, pre-employment transition services are only those required, authorized and pre-employment transition coordination activities listed in section 113 of the Rehabilitation Act, and implementing regulation §361.48(a). Funds reserved in accordance with section 110(d) of the Rehabilitation Act must be used solely for those costs incurred in the provision of pre-employment transition services. VR agencies must analyze each cost to determine whether it: 1) fits within the scope of the itemized pre-employment transition services in the Rehabilitation Act; and 2) was incurred solely for the benefit of a “student with a disability.” For example, workplace readiness training may include the provision of orientation and mobility training, such as travel training to access workplace readiness training, or learn to travel independently in the community. These acquired skills could be used by students with disabilities to access additional pre-employment transition services, if needed. Should a student with a disability need more individualized transition services, VR services or supportive services (e.g., travel expenses or job coaching services) under section 103(a) of the Rehabilitation Act and §361.48(b), he or she would need to apply for and be determined eligible for VR services, and have an approved IPE to receive those services funded with non-reserved title I funds.

29. If a VR Agency uses peer mentors to provide any of the five required pre-employment transition services, can they charge the cost of the peer mentor delivering the required pre-ets service to the minimum reserve requirement for pre-ets?

Yes. The peer mentor in this scenario is treated in the same way as any other contracted service provider and the cost incurred providing direct pre-ets services that fall under any of the five required pre-ets activities, could be charged to the funds reserved for pre-employment transition services.

30. The agency is not sure how to best report pre-ets expenditures on the RSA-2. The agency is aware of other VR agencies using code 186 (Other Services) to collect Pre-ETS services while other agencies have been using other codes that are closely related to the required Pre-ETS services. Is there guidance currently on which code to use for the RSA-2 to report these expenditures?

The correct code to use with the current RSA-2 is code 186, until new version of RSA-2 comes out.