



Frequently Asked Questions (FAQ) WIOA Basics Webinars - December 2015

Glossary of Terms

AEA	Area Education Agency
CRP	Community Rehabilitation Program
CTP	Collaborative Transition Protocol
DE	Department of Education
ICF/ID	Intermediate Care Facility for the Intellectually Disabled
IEP	Individualized Education Program
IPE	Individualized Plan for Employment
IVRS	Iowa Vocational Rehabilitation Services
LEA	Local Education Agency
PETS	Pre-Employment Transition Services
TAP	Transition Alliance Program
WIOA	Workforce Innovation and Opportunity Act

General Questions

1. What is the assessment process for identifying students for intensive services?

There is no specific process. As a student takes part in PETS activities, the person running the activities would document any challenges/needs that arise. Open lines of communication between IVRS and education will help in this process.

2. Who will pay for items (such as tools) that a student needs for work? Will the school be responsible for paying for the portion not covered by IVRS?

The school is responsible for any costs related to the student's IEP services, including those provided in 4+ programs. IVRS may pick up the costs when the tools are directly related to the student's employment outcome as outlined in the IPE; these decisions are made on an individual basis by IVRS.

3. What if a student needs tools to start a 4+ program and will also use them after school? What information will be necessary to show demonstrated success?

When a student begins a program, the school will be responsible to assist a student in acquiring the necessary materials and tools to participate in their post-secondary program. IVRS would assist with tools after the student has demonstrated success by achieving a 2.5 GPA in the training and evidence they have developed the skills to work in the field of study. The 2.5 GPA must be in the actual course of study and not in remedial work. IVRS would assist based on a financial needs analysis and if there is a financial obligation from that analysis, IVRS would only fund the portion not covered by the family income.

4. Who would be required to pay for interpretation services when needed by a student?

If you are working with a student who is deaf and hard of hearing and the student is participating in a school activity then the school is responsible for the interpreting. If the service is an IVRS- based activity then IVRS would be responsible for the interpreting.

5. How will IVRS coordinate with the LEA after the student has completed high school when the LEA responsibility has been completed?

After a student has graduated from high school and exited IEP services, the IEP would no longer be in effect. If extended support is needed for supported employment services, IVRS and LEA staff will work together to arrange these services while the student is still in high school. After graduation, if the student has been determined to be eligible for IVRS, he/she would work directly with their IVRS counselor.

6. What is the difference between an IPE and an IEP?

An IPE is the Individualized Plan for Employment which is a document created by IVRS. The IEP is an Individualized Education Program which is the responsibility of education. As we move forward with WIOA, the goal is that the schools and IVRS will become partners in this process and information can be shared between the two organizations to make sure the two documents are aligned and everyone is working toward the same outcomes for the student.

7. Can a student have an IPE while still in high school?

Yes. The IPE should be developed within 90 days of an IVRS case file being opened. Open conversation should be occurring so there is alignment between the IPE and the IEP.

8. Can the IPE and the vocational goal in the IEP be the same?

Yes. The IEP and IPE should align in order to provide maximum benefit to the student.

9. What is the LEA role in creating the IPE?

The LEA role is to be part of the team that develops the IPE, just as IVRS is part of the team that develops the IEP. Both entities bring expertise to the planning that is necessary to effectively prepare the student for transition.

10. When does the IPE begin?

The IPE begins when the necessary required signatures have been obtained from parents and the student. Timeframes for specified services are outlined in the IPE.

11. What if the LEA disagrees with the IPE?

Local team discussions are vitally important in the development of the IEP/IPE. Although it is not legally required for the IEP and the IPE to agree, it is in the best interest of everyone for them to be aligned. For instance, IVRS will only provide services in accordance with the IPE. If an agreement cannot be reached in this regard, you would need to follow the process in your area. For IVRS, this would involve the IVRS Area Office Supervisor and, if needed, the Resource Manager.

Job Coaching

12. Is every student who has an IEP entitled to job coaching?

If the student has a need for job coaching, as a result of his/her disability, job coaching should be provided. The need for this service would be determined by the student's IEP team. Districts must evaluate, through the IEP process, whether the student needs employment preparation services and address any needs that are identified, including job coaching, as appropriate, per IDEA requirements.

13. What is the responsibility of schools to provide job coaching?

When the student is still in high school, the job coaching is considered to be an instructional component of the IEP which is the responsibility of the school, if this need is a result of the student's disability (as described in question #27). The school can either provide these services themselves or they can contract with another entity to provide the services. If it is necessary for these services to be provided outside of the typical school day, it is still the school's responsibility to provide them. Lack of staff is not a sufficient reason to withhold provision of services.

14. Does the school pay for job coaching for graduates?

Once the student has graduated, the LEA is not responsible for paying for job coaching.

15. Who pays for job coaching for students involved in a TAP program?

If a student is involved in the TAP program, job coaching supports and services are provided through the TAP contract.

16. Can IVRS provide job coaching during the student's senior year since the transition flow of services model is no longer being used?

The Workforce Innovation and Opportunity Act provides a description of the continuum of services that IVRS must follow when working with students in transition, and therefore, IVRS no longer follows the transition flow of services model. When the student is still in high school, the job coaching is considered to be an instructional component of the IEP which is the responsibility of the school. The school can either provide these services themselves or they can contract with a CRP to provide the services.

17. When does IVRS step in and pay for job coaching?

IVRS would take over the cost of job coaching when the student has graduated from high school. This would also be the case for a student who is NOT on an IEP but has the need for job coaching, in accordance with IVRS policy.

18. If the local district is unable or unwilling to provide job coaching will VR be able to cover it? If not, are there any other options for the student?

When the student is still in high school, the job coaching is considered to be an instructional component of the IEP which is the responsibility of the school. The school can either provide these services themselves or they can contract with a Community Rehabilitation Provider (CRP) to provide the services.

When situations such as this arise, having a team meeting with all parties involved in the student's transitional services in attendance, the team can work on alternative solutions to the issue. However, the school is still responsible for the cost of the job coaching while the student is in school. The staffing team may consider alternatives such as natural supports if appropriate, as well as the IVRS Counselor working with the business to design a training plan that achieves outcomes with the assistance of the student's paraprofessional/job coach.

19. Are schools able to use paras for job coaching?

Yes.

20. Who will be providing job coaching services for students in Work Readiness Assessments?

Prior to using a Work Readiness Assessment for a high school student, IVRS would first want to consider all information available through the school. If a Work Readiness Assessment is needed, and it is required by IVRS for the IPE and is not something needed by the school or part of the IEP, IVRS would assume this cost. However, work readiness assessments may be performed and completed by work experience coordinators and special education teachers who are evaluating the student's skill sets as part of the IEP planning. IVRS may also provide this service directly by VR staff as they have the tools and expertise to do so. It should be a collaborative decision on the part of IVRS and the LEA on how to obtain the information that is needed.

21. Will eligible students be able to access IVRS services throughout the summer?

Yes, students are able to access IVRS services during the summer.

22. Can employment services be considered part of the extended school year supports?

This would be based on student need and would be determined by the student's IEP team.

CRP/Sub-minimum Wages

23. What is the expected role with the Most Significantly Disabled who are ICF/ID level and may not ever be ready for even sub-minimum wage level employment?

For individuals who need to access adult day habilitation services, these students may receive those services through a CRP. However, for those needing work services, according to the legislation, there are specific conditions that must be met before employers can either:

- (1) hire youth with disabilities (24 and under), or
- (2) before they can continue to employ individuals with disabilities of any age at the subminimum wage level.

Prior to beginning sub-minimum wage employment, the youth has been provided documentation indicating completion of all of these activities:

- (1) The youth has received pre-employment transition services (PETS); and
- (2) The youth has applied for IVRS services and has been determined ineligible or has been determined eligible and has an IPE (Individualized Plan for Employment). After a reasonable amount of time, all efforts to work towards the specified employment goal are unsuccessful and therefore the IVRS case has been closed; and
- (3) The youth has been provided career counseling and information and referral that helps to facilitate independent decision-making and informed choice so that youth can continue to work towards competitive integrated employment.

Once these conditions are met, the IVRS staff must consolidate the information from the LEA and IVRS into one reporting instrument so the parent and the youth may access services through a CRP. The youth can then be considered for subminimum wage level employment. The purpose of these conditions is the idea of Employment First, or that everyone, with the appropriate supports, should have the opportunity to work towards competitive employment in the community and employment should be the first, and not the last, option. The other intention here is that youth will be connected with IVRS and aware of IVRS employment services prior to going into this type of setting.

24. Can the school contract with a CRP who has a sub-minimum wage contract but who also provides minimum wage jobs and job coaching?

While final regulations of the WIOA legislation have not been released, our current understanding of the legislation is that schools are not allowed to contract with CRPs to directly provide transition services to students into segregated programs (see above). However, schools are allowed to contract with CRPs for all services within an integrated community setting that are not sub-minimum wage. The key in this is that the work is integrated and meets the integration definition, most specifically their co-workers are not disabled and it is located in a business in the community.

25. Will students who are being served in a "Year 13" program where they receive vocational training, as well as other life skills training until age 21, be able to access these services where they are currently being paid sub-minimum wage?

In order for students to access such services, schools will need to document that the rules of Section 511 have been followed. If they are being compensated at sub-minimum wage for work experiences, they must participate in competitive integrated employment for minimum wage and demonstrate their skill sets there before any referral to a CRP is an option.

26. Does the CTP still have a place in this? Will that work/support continue, especially as it pertains to IVRS eligibility and determination of needs?

The CTP process has evolved into the Collaborative Outcomes for Students (COS). Additional information on this can be obtained from your local IVRS representative.

27. What should an IEP team consider when determining whether a student needs employment services as part of the IEP?

Multiple factors should be considered to determine if employment services need to be included in the IEP and the intensity of those services. These factors are:

1. Student's knowledge and skills
2. Student learning characteristics
3. Complexity of support needs
4. Number of environments affected

The more intense the need for services, the earlier the preparation should begin and the more explicit the services should be. This would include the inclusion of people who have specialized knowledge (i.e., work experience coordinator, IVRS counselor) of employment services.

Pre-Employment Transition Services (PETS)

28. When it says REQUIRED... are these required activities for all students on an IEP and 504?

All students who are considered to be Potentially Eligible (students receiving services through an IEP or are covered under a 504 Plan) should have the opportunity to take part in these types of activities.

There are three categories of PETS activities: Required, Authorized and Coordinated. "Required" is the title of one type of activity in the legislation. Although these are the activities that will occur most often in the schools, it is not required that each potentially eligible student take part in each of these activities. If additional clarification is needed, please contact the IVRS counselor in your area.

29. What is the difference between PETS Authorized Activities and Coordinated Activities?

Required Activities:

1. Job exploration counseling;
2. 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;
3. Counseling on opportunities for enrollment in comprehensive transition or postsecondary education programs at institutions of higher education;
4. Workplace readiness training to develop social skills and independent living; and
5. 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).

Authorized Activities:

1. Implementing effective strategies to increase the likelihood of independent living and inclusion in communities and competitive integrated workplaces;
2. Developing and improving strategies for individuals with intellectual disabilities and individuals with significant disabilities to live independently; participate in postsecondary education experiences; and obtain, advance in and retain competitive integrated employment;
3. Providing instruction to vocational rehabilitation counselors, school transition personnel, and others supporting students with disabilities;
4. Disseminating information about innovative, effective, and efficient approaches to achieve the goals of transition;
5. Coordinating activities with transition services provided by LEAs under the IDEA;
6. Applying evidenced-based findings to improve policy, procedure, practice, and the preparation of personnel, in order to achieve seamless transition;
7. Developing model transition demonstration projects;
8. Establishing or supporting multistate or regional partnerships involving State, LEAs, VR agencies, developmental disability agencies, private businesses, or other participants to develop transition systems;
9. Disseminating information and strategies to improve the transition to postsecondary activities of members of traditionally unserved and underserved populations;

Pre-Employment Transition Coordination:

1. Attending individualized education program meetings for students with disabilities when invited;
2. 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;
3. Working with school, including those carrying out activities to coordinate and ensure the provision of pre-employment transition services;
4. When invited, attending person-centered planning meetings for individuals receiving social security benefits.