

This email outlines the IVRS process for individuals choosing subminimum wage employment (SMW), and the process for individuals who currently earn SMW.

The process for students and youth is different than the process required for individuals over age 24; although IVRS is responsible to document that all individuals earning SMW receive career counseling and information & referral services required by law (WIOA).

*For documentation purposes, IVRS uses one of three forms, depending on an individual's age and school status. IVRS staff should follow the instructions outlined under the scenario that depicts the individual's age and school status, using the prescribed form.*

1. **Student Refusal form** (22014307)
2. **Refusal of Services by Individuals Out of School form** (21325927)
3. **Certificate of Attendance** (21325929)

### **Students Age 21 and Below:**

1. Students age 21 or younger who are still in high school and have an open file with IVRS but choose to work at subminimum wage:
  - a. IVRS and the LEA both must provide pre-employment transition services to the student and document these services were provided.
  - b. IVRS will document services through the eligibility justification, the Individual Plan for Employment, corresponding reviews and amendments, and the final case closure.
  - c. IVRS must provide a copy of this documentation and the documentation accumulated by the LEA to the individual (IVRS and LEA signatures both must be represented on the documentation.)
  - d. The LEA must provide the documentation to IVRS within 30 calendar days of completion.
  - e. IVRS must prepare a cover memo identifying the documentation being provided to the individual and the method by which the documents were transmitted, (i.e. fax, email, postal service, hand delivered).
  - f. The CRP must obtain these documents from the student/parent.
2. Students age 21 and younger who are still in high school and refuse services from IVRS:
  - a. The IVRS **Students Refusal form** will be completed, signed and dated by the IVRS representative, when the student is known to IVRS.
  - b. For students not known to IVRS, the LEA representative will submit documentation of the **Students Refusal form** to IVRS within 5 calendar days of the refusal, along with a cover memo that identifies how the information was transmitted. LEA staff should advise the student/parent that by not participating with IVRS, a CRP may refuse to serve the student.
  - c. A copy of the **Students Refusal form** is sent to the IVRS Resource Manager in charge of Independent Living.

### **Age 24 and Below:**

1. Individuals who are age 24 or younger and currently working at SMW, but are out of high school:
  - a. *Youth who refuse* career counseling and information & referral services, who decide not to proceed with additional services, and *did not receive Pre-ETS*:
    - i. If the youth refuses, then the **Out of School Refusal form** should be completed and submitted to the IVRS Resource Manager in charge of Independent Living.
  - b. *Youth who refuse* career counseling and information & referral services, who decide not to proceed with additional services, and *received Pre-ETS*:
    - i. If the CRP has a copy of the youth's Individual Education Program and the IEP demonstrates that pre-employment transition services (Pre-ETS) were provided, IVRS may document that on the **Out of School Refusal form** acknowledging that IVRS only reviewed the file and determined Pre-ETS services were provided. IVRS does not require a release to review these records according to CFR 397.50(a).

### **Age 25 and Above:**

1. Individuals age 25 and older who are currently working at subminimum wage and do not want to participate with IVRS:
  - a. Individuals who are not working with IVRS and do not have an interest in being served by IVRS may access career counseling and information & referral services through webinars provided by the Iowa Coalition for Integration and Employment (ICIE).
  - b. Individuals must participate in career counseling and information & referral services every six months of employment at subminimum wage their first year and annually thereafter for the duration of subminimum wage employment.
  - c. A **Certificate of Attendance** acknowledging the individual's participation is provided to the individual by IVRS. The IVRS state office emails completed certificates to the local IVRS office which makes two copies to deliver to the individual at the CRP (the individual may provide their second copy to the CRP).
2. Individuals age 25 and above who work with both IVRS and a CRP while earning SMW:
  - a. IVRS provides career counseling and information & referral services to the individual and documented on their **Individual Plan for Employment (IPE)**.
  - b. The IVRS job candidate may provide the CRP a copy of their signed IPE to document their involvement in IVRS career counseling and information & referral services.
  - c. IVRS jc's must participate in career counseling and information & referral services every six months of employment at SMW their first year and annually thereafter for the duration of subminimum wage employment.
  - d. The CRP may obtain a release of information form to get a copy of the job candidate's IPE from IVRS.

## In short:

- **The Certificates of Attendance** IVRS provides to a CRP are only for clients whose case is not open with IVRS. Webinars from which certificates are issued were designed for individuals not involved with IVRS.
- IVRS staff provide the necessary counseling and guidance and information & referral services to job candidates with open IVRS files who work at SMW, which is documented, on their IPE. IVRS staff provide a copy of the IPE to the jc to share with the CRP and no other documentation is necessary. These individuals are not required to participate in the webinars, despite earning SMW.
- If a client is NOT working with IVRS, they view the career counseling and information & referral webinars at regular intervals. The only involvement IVRS staff have in these cases is delivering the signed **Certificates of Attendance** generated by the IVRS state office, which are emailed to the IVRS office nearest the CRP.
- If a former JC is earning SMW, IVRS staff will be asked to have the **Out of School Refusal form** signed when notified by the IVRS state office that this documentation is due. IVRS does not have to continue to provide follow-up to individuals after two years, though the SMW earner is still required to receive career counseling and I&R services.