Partnerships in Employment National Transition Systems Change Project: Building a Transition-to-Employment Agenda

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The national Partnerships in Employment (PIE) National Transition Systems Change Project was established in 2011 by the Administration on Intellectual and Developmental Disabilities. This five-year project focuses on improving, developing, and implementing policies and practices that raise community expectations and overall employment outcomes for youth with intellectual/developmental disabilities (I/DD). Now in the last phase of the funding cycle, the eight state projects involved in the PIE initiative (Alaska, California, Iowa, Mississippi, Missouri, New York, Tennessee, and Wisconsin) are uniquely positioned to provide youth employment recommendations to federal, state, and local agencies. In this document, we share several of the findings and recommendations.

Partnerships projects are working within and across state agencies (education, vocational rehabilitation, developmental disabilities, Medicaid, and workforce development) to effect change and develop systems solutions. In addition, these projects are reaching out to youth, families, employers, and service providers to build awareness of promising practices, encourage advocacy, and promote community partnerships to create widespread change and improved employment outcomes.

Early findings from PIE projects test best practices and policy changes and confirm recent research in the area of transition and youth employment. Project findings also highlight barriers to employment and inform specific recommendations across state and federal agencies and policy that can significantly improve youth outcomes.

OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

Recommendations to NIDILRR/OSERS/IES

» Dedicate research priorities that obtain national data on the impacts of inclusion, family engagement, peer supports, access to general education curriculum, and college and workforce readiness preparation that impacts post-school outcomes/success (NSTTAC, Predictors and Disability Categories, January 2013). Specific research is required on the predictors that contribute to successful education and competitive employment outcomes for individuals with intellectual disabilities. Without research evidence on how practices impact long-term employment outcomes, it is difficult to make specific recommendations on evidence-based practices in transition.

Recommendations to Office of Special Education Programs (OSEP)

» Redefine “Highly Qualified Special Education Teacher” to reflect the unique skills necessary to effectively provide and plan for required transition services that lead to employment outcomes. Require states to adopt transition competencies as part of teacher certification curriculum.

National data show that less than half of all special education personnel preparation programs address transition standards, and only 45% offer a stand-alone course on transition.1 Transition educators across PIE projects report a significant lack of pre-service and professional development support in the area of transition, with substantial variations. Some states do not have any professional development requirements for transition. Others use a cross-categorical K-12 special education teacher certification that may expose a teacher to as little as one college lecture on transition content. Yet, this certification allows a teacher to meet the federal “highly qualified” standard. In a recent survey of Wisconsin teachers, only half of participating high schools provided teachers with education and development in the areas of applying academic and career education, forming relations with technical schools and colleges, and developing school-to-

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work programs.²

» Issue guidance on data collection and analysis related to postsecondary outcomes (Indicator 14). Make Indicator 14 data collection annual, mandatory and consistent across states. Ensure that survey data can easily be disaggregated. Capture competitive employment outcomes that are less than 20 hours a week but exclude sheltered work as an employment outcome. OSEP should exercise its due diligence in examining Indicator 14 data, comparing the results over time, and adhering to corrective measures. Additional resources should be budgeted for on-site monitoring and technical assistance for performance improvement.

PIE projects report wide differences in how data is obtained and reported by state education agencies.³ In Iowa, staff members routinely use Indicator 14 data across state agencies to monitor performance and identify areas requiring practice changes. Other state projects have difficulty obtaining data such as Mississippi, although it should be readily available to the public.

In one state, Indicator 14 data collected during the last four years shows an alarming upward trend in sheltered workshop placements for youth with autism and intellectual disabilities, and a correlating decrease in paid work experiences post-high school. Since Indicator 14 is not a compliance indicator, the schools have no obligation to develop corrective action or improve outcomes; they have met the Indicator 14 outcome merely by reporting. Since initiation of the PIE project, Wisconsin school districts have agreed to begin collecting Indicator 14 data annually (instead of every five years, which is the official requirement) starting in school year 2014–2015, and have moved to an educator interview process (instead of using a survey company) that has resulted in higher survey rates.

» Issue guidance to promote education in the least restrictive environment in the general education classroom at the high school level and support States to align instruction with Common Core Standards.

PIE school sites have demonstrated the correlation between general education inclusion/access to general education environments in high school and improvement in employment rates for students with I/DD, consistent with the literature.⁴ PIE projects have focused on embedding this practice, but educators and states report difficulty in redesigning high school models to promote inclusion, primarily because of the individuality of the operating policies of Local Education Agencies within a state. PIE states speak to the necessity of having a superintendent or school principal as a catalyst for changing practices in schools.

Teachers also indicate difficulty aligning inclusive instruction options with new Common Core Standards. Wisconsin PIE schools started with a baseline of 43% of pilot school youth in segregated courses and activities, 48% in integrated. After 18 months, schools reported 17% of students in segregated options, while 71% were in integrated courses and activities. As participation in integrated courses and activities jumped, employment rates went from 13% baseline to 40% among the same youth.

» The Department of Education, Rehabilitation Services Administration, Social Security Administration, and Centers for Medicare and Medicaid Services must work toward presumptive eligibility and a common application process across state agencies for youth with I/DD with a focus on securing automatic eligibility for waiver-eligible youth who desire employment.

» Issue guidance to State Education Agencies (SEAs) on a vocational rehabilitation (VR) referral protocols and timelines. Ensure a mechanism is in place for families to be provided meaningful information on the benefits of VR services beginning in freshman year of high school.

» Any reauthorization of IDEA must:
  • Re-establish the age of transition to no later than age 14.
  • Require early connection to vocational rehabilitation services (no later than age 15) at the earliest point of transition.

• Further define a summary of performance to include a record of a youth’s integrated work experiences and require in the description of the transition services the integrated work experiences that will be provided to assist in reaching postsecondary goals.

• Require MOUs to define the provision and coordination of transition services by teachers and transition coordinators with vocational rehabilitation staff.

» Issue guidance and update regulation where necessary to clarify how Extended School Year (ESY) policies and FAPE apply to use of ESY services to sustain youth employment and maintain progress in acquisition of employment skills.

For reasons stated previously, PIE states are finding strong associations between early work experiences and improved youth employment outcomes. Many schools and parents report difficulty accessing ESY services to support employment, even when warranted to maintain progress and keep a paid community job. High school-age peers without disabilities often obtain their first jobs after school and over summer break. Because youth with disabilities require additional supports to achieve the same employment results, ESY is a valuable tool for IEP teams to consider as a component of comprehensive transition planning.

» Issue additional guidance and clarification related to least restrictive environment (LRE) in work placements for transition-age youth.

The June 22, 2012 OSEP letter providing an opinion on the application of least restrictive environment to transition-age youth has been a helpful resource to states and educators. However, additional OSEP clarification should provide examples of appropriate supplementary aids and services in the LRE, and of ways to write and implement the IEP to increase work assessments in inclusive, community-based environments. SEAs should be required to monitor and document how this guideline is being followed.

The following examples are derived from evidence-based practices to teach job skills and components of community-based instruction. More detailed descriptions can be found at www.nsttac.org.

» Instruction within integrated community settings to teach community integration skills (e.g., mailing a letter, cashing a check, crossing the street, calling on a cell phone when lost)

» Instruction within integrated employment settings in the community to teach employment skills (e.g., communicating with co-workers and supervisors, completing a specific sequence of job tasks)

» Simulated instruction immediately preceding community-based instruction (CBI) to teach both community integration and employment skills

» Video modeling immediately preceding CBI to teach mailing a letter, cashing a check, etc.

» Role play immediately preceding CBI to teach making purchases in a store

» Least to most prompting in CBI to teach specific job skills (e.g., operating a copy machine, communication skills on the job, communicating on a cell phone when lost, and purchasing using the “next dollar” strategy in a store)

» Concurrent sequencing (all steps presented before initiating task) in CBI to teach following a grocery list

» Constant time delay in CBI to teach mailing a letter, cashing a check, operating a copy machine, etc.

» Progressive time delay in CBI to teach crossing the street and using a public phone

» Picture cues (response prompting) in CBI to teach purchasing items from a list in the grocery store and initiating job tasks in a cafeteria

Evidence-based practices that occur in school and are correlated with improved employment outcomes for students with disabilities include:

» Career awareness (e.g., awareness of occupations, awareness of abilities and skills) and job search skills (e.g., ability to match interests, skills, and values with occupation)

» Paid work experience (e.g., two or more paid jobs while in high school, one full year of paid employment in high school, employed at the time of high school exit)

» Work study (e.g., participation in defined work study program in high school)

» Community-based instruction of social skills, community access (e.g., public transportation), independent living skills, and specific job skills
General education access (e.g., integration in a regular school setting, majority of school day in regular education settings)

Allow students with significant disabilities who obtain a regular high school diploma to be eligible to receive three more years of service through their school district.

Many employers still require a regular high school diploma as a prerequisite to hiring an employee, and the vast majority of institutions of higher education also require a regular high school diploma. However, there are many cases when a student with a disability may have earned enough credits to graduate, but not have met all of his or her IEP goals related to transition. Allowing students with disabilities to receive up to three more years of services through the school district to work towards achieving integrated employment should greatly increase the likelihood that the student will obtain the skills and work experience for successful employment in the community.

Recommendations:

- Review policies and issue joint guidance to ensure that prior to each student’s secondary education graduation, the student’s IEP team has identified and engaged the responsible agencies, resources, and accommodations required for postsecondary education that would include the types of supports needed for student success.

- Require postsecondary experiences to involve multiple competitive integrated employment experiences, including paid internships in integrated settings, to ensure that the entire experience is oriented and coordinated to support the student’s identified career goal.

- Fund a research study to identify the curriculum, career counseling services, and supports provided by postsecondary education that led to employment outcomes (occupation, hours worked, wages).

Provide guidance to State Education Agencies (SEAs) on eliminating contracts with sub-minimum wage license holders. Support SEAs with examples of proven strategies to increase early competitive integrated work experiences for youth. While WIOA prohibits this practice, schools are still in great need of guidance on how to transition from contracts with sheltered workshops to community-based, integrated employment. Guidance should include:

- **Community Conversations** help to raise awareness among key community stakeholders such as employers, Chambers of Commerce, youth groups (e.g., Boys & Girls Clubs), faith-based communities, members of civic organizations (e.g., Rotary Club). In Wisconsin, community members who attended these conversations reported that they believed youth with disabilities could be employed in the community. 25% of respondents were employers. Tennessee and California have experienced similar results.

- School staff should participate in **resource mapping** to identify the wide variety of potential partners the community has, which job placement professionals can then target for work placements for students with disabilities.

- Youth with significant disabilities need **earlier connection to vocational rehabilitation services**. Schools must connect youth with significant disabilities to their local vocational rehabilitation (VR) counselor earlier (by age 15) so that students may be prepared to enter the workforce. PIE grant states report earlier connection to VR as the most important change in practice that has improved employment outcomes for youth.

- Schools should be encouraged to have an in-house position focused on developing community-based jobs for students with and without disabilities. State agencies must work together to offer training on quality supported employment to ensure providers are equipped to use best practices.

- Issue guidance to school districts to locate work experiences that are outside of the high school. Work experiences should mirror the types of jobs that are available within the community to provide students with the context of competitive employment positions, including the expectations of the business, the workplace culture, building relationships with coworkers, and quality and productivity norms.

- Issue guidance to SEAs that specify that
students with disabilities should receive the same level and type of career counseling as students who are not classified as having a disability. Teachers should recommend that career counseling be discussed at annual IEP meetings beginning at age 14.

**RECOMMENDATIONS TO REHABILITATION SERVICES ADMINISTRATION (RSA)**

» Early connection to vocational rehabilitation services should be formalized and required. Federal agencies should jointly issue guidance on best practices for collaboration in serving youth. This section will be addressed in WIOA.

PIE grant states report early connection to vocational rehabilitation (VR) counselors as the most important change in practice that has improved employment outcomes for youth. In Wisconsin, where the Division of Vocational Rehabilitation (DVR) has mandated early connection in grant-involved schools, employment rates have jumped from a baseline of 13% for youth ages 15 to 17 in year one to 67% in year three. However, state DVR agencies report a lack of guidance and support from federal RSA for involvement with youth, and IEP teams outside of the PIE grant treat DVR involvement as optional. Families and many schools report limited or no understanding of DVR services.

» The Rehabilitation Services Administration, Department of Education, Social Security Administration, and Centers for Medicare and Medicaid Services must work toward presumptive eligibility and a common application process across state agencies for youth with I/DD, with a focus on securing automatic eligibility for waiver-eligible youth who desire employment.

» RSA should encourage states to develop an electronic sub-minimum-wage data-collection system to track age, disability, hours per week working and not working, how frequently an individual is reassessed, and how long the individual has been at the sheltered workshop. Ensure this is a publicly searchable system. In Wisconsin, the Department of Workforce Development developed such a system, which VR is taking advantage of. The system makes it much easier to identify who is out of compliance with reporting, and helps to identify geographic patterns that make it evident where people are tracked into sheltered workshops.

- Issue clear guidance on when and how VR counselors can begin working with students with the most significant disabilities (e.g., earlier than two years before graduation). Include case examples in training to all VR counselors on when and how early VR involvement is appropriate and effective for competitive employment outcomes.
- Establish a statewide best-practice model where all students experience job placements in community-integrated, competitive-wage employment within a high school transition program, and are automatically supported within the adult Medicaid Long-Term Services and Supports (LTSS) system in a state. VR counselors, employment providers, and educators should collaborate so that the job development that was prioritized while the student was in school transitions with them after they graduate.
- Issue guidance on recommended caseload limits that are much lower when working with youth. Many VR entities are reluctant to work with youth at earlier ages, citing high caseloads and inability to provide enough time to cases. Some counselors have caseloads of over 200. The 100-caseload norm is not sufficient to support youth.
- Establish an expectation that students entering the long-term services and supports system are connected to Work Incentive Benefits Counseling at time of eligibility, and that individuals are automatically referred to DVR for employment services.

» Interagency coordination between the State Education Agency, State Division of Vocational Rehabilitation, and the state Medicaid Agency or Long-Term Services and Supports Developmental Disabilities Agency must be mandated. Federal agencies must provide implementation guidance.

Many PIE states have identified interagency agreements as a critical component to promote collaboration and improve youth employment
outcomes, particularly Alaska, California, Iowa, and Tennessee. Medicaid agencies and long-term services and supports are not well-integrated in PIE states, and their role with VR and schools is not well-defined, even though ongoing employment supports for youth with significant disabilities are largely dependent on Medicaid funding and systems. Although RSA reported on 5/15/14 in the national Youth Transitions Collaborative that state monitoring includes targeted review of mandated DVR/SEA interagency agreements, PIE states report implementation is poor and does not reach the local level.

State agencies having MOUs with specific benchmarks such as braided funding, numerical targets for competitive employment, and a clarification of roles and responsibilities have been able to promote new and promising policies such as funding proposals in Iowa, a transition to employment strategic plan in Tennessee, a blueprint for competitive employment in California, and an employment matrix in Alaska.

PIE sites still report issues with “payer of last resort” policies, which often result in roadblocks to funding. Medicaid- or VR-funded supports that should be available to enable summer, weekend, and after-school employment experiences are either not promoted or not readily available.

» Federally mandated Memorandums of Understanding (MOUs) should include the Medicaid agency, specifying practices for blending and braiding of resources, clarifying the funder of last resort mandates, identifying roles and responsibilities and having a plan for dissemination of this information to individuals, families and professionals. Importantly, Interagency Agreements must include benchmarking and shared data collection processes and analyses, and track outcomes of collaboration over time.

» Incentivize development and scale-up of youth-targeted promising practices, like On-The-Job Training (Youth-OJT) initiatives across all states.

Adult OJT initiatives (funded initially by VR agencies with federal ARRA monies) have resulted in permanent employment for 83 to 88% of participants. Wisconsin’s Youth OJT (funded by VR) provides a wage subsidy of up to 100% reimbursement to allow a business to offer competitive employment (i.e., a permanent job offer) to a youth with significant disabilities in a transition timeframe of up to 500 hours.

In PIE pilot projects, youth who used the OJT model or had their wages supported directly through DVR had nearly double the monthly work hours and 39% higher monthly earnings than other students. Early results show that the OJT model is also leading to sustained employment for youth.

» Clarify payer of last resort policies to eliminate barriers to youth accessing supports in the summer, after school, and on weekends.

» Analyze policies and practices that act as barriers for youth in accessing early VR supports and services (e.g., paperwork and application burden, language barriers). Provide analysis to state with specific guidance on improvements.

**RECOMMENDATIONS TO THE CENTERS FOR MEDICAID AND MEDICARE SERVICES (CMS)**

» Change and clarify Medicaid policy to allow for personal care on the job, for personal care workers to simultaneously serve as job coaches, and for job coaches to be allowed to provide and be paid for personal care. Core competencies and Medicaid provider qualifications must include understanding of how non-work services support employment. Issue related guidance to inform state policies and practice.

Research shows that integrated employment has a link to healthier outcomes for individuals with disabilities and individuals with autism, and can reduce the symptoms of their disability. However, PIE grants report various obstacles regarding state system coordination and ability to support people with significant disabilities on the job.

Reviewing and revising Medicaid-funded policies

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7 Wisconsin Department of Workforce Development Annual Report, 2013.

that promote quality health and personal care so that these policies do not serve as a disincentive to employment can reduce some of these barriers.

More specifically, an array of Medicaid-funded non-work services can be used to support work (e.g., personal care services can be used in the workplace; transportation services can get someone to and from a job; adaptive aids can support employment), prepare for work (volunteering, mobility training), and explore possibilities regarding work (e.g., job shadowing, career exploration) to further facilitate informed choice.9 The Alaska PIE project is currently exploring approaches for personal assistants to be reimbursed for providing employment supports at the workplace.

» Aging and Disability Resource Centers (ADRCs) and other federally funded “No Wrong Door” options must extend their focus to be available as one-stop information centers and provide reliable information to youth and families learn about long-term supports and community living options that can inform choices at earlier stages.

ADRCs can play an important information and referral role. However, these centers are limited in their ability and funding to work with youth and their families younger than age 17 years and six months. For example, in many rural areas in Wisconsin, there are no other places to get comprehensive information about long-term support options and benefits that can inform families’ choices.

In Wisconsin, a state with one of the most comprehensive ADRC networks, PIE pilot schools have unanimously agreed that starting the formal transition process at younger ages (across agencies) is a significant factor in improving outcomes. Since ADRCs are the portal to the adult system and families’ one-stop they should be funded to play an earlier and more defined role.

» Provide clear guidance on how states must develop a full range of community-based supports in all service categories: community-based day services, pre-vocational services, and vocational services to build a full day of community-integrated activities for individuals using long-term supports.

PIE grant states are consistently finding that families, youth, and schools do not understand the full range of Medicaid-funded adult long-term services and supports. Schools report that families often choose facility-based employment because it provides a full week of support, as opposed to integrated employment, which is typically part-time.10 11 Federal agencies and funding streams should support coordination among state agency administrators, providers, home and residential support agencies, and others to design inclusive community-based lives that include both employment and non-work hours.

People with I/DD are frequently prevented from working nights and weekends because of the lack of flexibility in the structure of their service delivery supports, living situation, and limited transportation options. Funding, regulatory, and systems strategies need to support varied work schedules and community-based recreational and educational options.12

Federal policy should clarify that community-based day supports and employment services can be provided to the same individual using a braided and coordinated funding approach. One of the California Employment Collaborative for Youth model projects is successfully using DD Regional Center funds and Department of Rehabilitation funds to provide comprehensive services and supports to individuals needing both community and employment services. The Alaska Supported Employment Matrix, a new policy in development, specifies funding responsibilities and outcomes expected from their state agencies.

» Medicaid funded programs should have an expectation that all working-age individuals can work. Information about career pathways and related education and training opportunities must be coordinated with Medicaid systems and encouraged as part of employment planning for an individual. Currently, Wisconsin’s long-term care programs start from a “Do you want to and do you think you can work?” framework.

» Supporting the competitive integrated

9 Wisconsin Department of Health Services Division of Long-Term Care: Managed Care and Employment Task Force Final Report (July 2008).


employment of individuals (including youth) with disabilities has been shown to reduce overall Medicaid costs and reliance on public benefits. Youth with more significant disabilities need the assurance of ongoing supports to retain their employment beyond transition from school and into adulthood. Many states are moving to larger managed-care models run by entities that have more experience with acute/primary care than with long-term services and supports for people with I/DD. CMS should issue guidance to states regarding best practices in performance measures and other incentives to increase competitive integrated employment across Medicaid-funded long-term services and supports systems, and should specify best practices in supporting seamless transition into LTSS for youth. Department of Education, Rehabilitation Services Administration, Social Security Administration, and CMS must work toward presumptive eligibility and a common application process across state agencies for youth with I/DD, with a focus on securing automatic eligibility for waiver-eligible youth who desire employment.

» Tie professional certifications and Medicaid provider qualifications to specific competencies related to understanding employment opportunities for Medicaid beneficiaries.

» Clarify payer of last resort policies to eliminate barriers to youth accessing supports in the summer, after school, and on weekends.

**SOCIAL SECURITY ADMINISTRATION (SSA)**

» Require independent living goals in transition planning for all youth that address understanding, work incentives, financial management and asset development. Pre-Employment Training under WIOA should include benefits counseling as an essential component of work readiness services. Develop and provide interagency guidance on the resources that families can access at the earliest possible stages of transition planning. Incentivize and require Work Incentives Benefits Counseling (WIBC) across publicly funded programs as a mandated service prior to accessing other benefits. Provide guidance on how to tailor WIBC information to younger (age 14) audiences and their families. Look to PROMISE grant early findings for promising practices in this area.

Lack of understanding about the correlation between earnings and benefits (by both families and professionals) has proven to be a major barrier to youth employment in PIE states. Providing “light touch” benefits counseling for families – just in time, and just the information they need at that time – will increase the impact of WIBC, and will be more cost-effective for state VR agencies, which often overpay for a full benefits analysis.

Families report being overwhelmed with too much information when they receive benefits counseling. Often, they have one or two specific questions, but are presented with confusing and lengthy benefits analysis reports. PIE states report that once families become accustomed to receiving benefits, they are reluctant to give them up. Expedited reinstatement should be explained to every family member at the time they apply for benefits for their son or daughter.

The Social Security Administration reports that youth-focused incentives (such as Student Earned Income Exclusions in Supplemental Security Income) are underused. National studies confirm that the fear of losing disability benefits is a barrier for people with disabilities who are seeking employment or career advancement.

WIBC has a proven direct correlation with improved employment outcomes, including higher earnings and higher employment rates. Specifically, the use of WIBC in Wisconsin showed significant success: Adults in Wisconsin who got WIBC started with higher quarterly earnings than those who did not receive the service, and subsequently increased

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by 60% their quarterly earnings within two years. Therefore, this PIE state has emphasized the tool in their work with youth. Wisconsin’s Social Security Administration-funded youth PROMISE grant also requires all students in the intervention group to receive WIBC.

» Issue guidance and other technical assistance geared toward families/youth related to how newly established ABLE accounts in states could support employment. Develop a system that would link SSA statements and ABLE account statements and would monitor people’s accounts so they would never go over their asset limits and be put in a situation where they have to pay back in to the system. Include an ABLE account balance on a person’s SSA statement. Develop an auto-pay system, similar to what people commonly use for paying household bills, for people establishing ABLE accounts. Or, at the very least, make Social Security benefits more understandable to people receiving benefits.

» Department of Education, Rehabilitation Services Administration, Social Security Administration, and Centers for Medicare and Medicaid Services must work toward presumptive eligibility and a common application process across state agencies for youth with I/DD with a focus on securing automatic eligibility for waiver-eligible youth who desire employment.

In Wisconsin, a PIE training model, Your Child Can Work, has been proven to increase parent expectations (engagement) by 100% on whether their son or daughter can work in integrated employment (baseline 20%; post-training 40%). This confirms other national research that found that youth with I/DD whose families expected them to be employed after high school were five times more likely to have a paid job in their community shortly after graduation, as compared to youth whose parents who did not have the same expectation.

High expectations of teachers also correlate with better employment outcomes. In a 2010 study, students whose teachers expected them to work during the summer were 15 times more likely to work than those who had teachers without that expectation.

OFFICE OF DISABILITY EMPLOYMENT POLICY (ODEP)

» Promote and fund pre-service training for professionals that emphasize parent engagement strategies and focuses on building high expectations related to employment.

» Provide guidance on how academic career plans should be linked with IDEA Indicator 13 planning, as well as new requirements for RSA to document pre-employment transition services in WIOA.

» Make recommendations on how state entities should share data with the public.

» Share best practices in American Job Centers serving youth with disabilities and provide guidance on provision of “best practice” pre-employment transition services required through WIOA.


