**Rachel Anderson:** Welcome back everybody. Today's our third training in an eight-part series discussing the implementation of PD 19-03, which is the case service report for RSA-911. As a reminder, here are the training series objectives. We do encourage you to watch all eight of our trainings. We're covering many content areas of the 911, and it can get pretty technical. So, we do encourage you to watch all of the trainings. So far, training one has covered background and implementation, and training two covered VR services and expenditure reporting.

Today, we're switching things up a little bit, and we have Rimal Desai with us from RSA. He's a management and program analyst in the Data Collection and Analysis Unit, and I am Rachel Anderson with the WINTAC. Today, our training is going to cover pre-employment transition services. Now, I want to make it clear that, today, we're not providing a training on pre-employment transition services. We are just referencing aspects of how you have to report these type of services in the RSA-911. If you need further information on TA or training related to pre-employment transition services, please make sure you're reaching out to your RSA liaison or the WINTAC pre-ETS team. They can give you a lot more information. We will be covering a couple of areas where, you know, this doesn't live in the 911 but you also might want to have it somewhere else. But we're not really going to go into too much detail more than into that. So today, we're going to cover reporting for reportable individuals and participants. We're going to discuss some of the major changes from PD 16-04 to PD 19-03. We're going to discuss all the quarterly reporting requirements for both potentially eligible and then also, participants who are students with disabilities. And then, we're going to just remind you of upcoming RSA-911 trainings and go over the tools and resources that we have for you today. So, I'm going to hand it off to Rimal to get us started. Rimal.

**Rimal Desai:** Thank you, Rachel. Hello, everyone. Thank you for joining us today, and today, we are going to talk about pre-employment transition services. So why we made changes to pre-employment transition services. After three years of data collection and analyzing it, we made few changes to PD 19-03. We were able to delete data elements to reduce the burden for data collection for agency and simplify reporting instruction for accurate reporting and preparing of the data. Okay, next slide.

We are going to talk about reportable individuals. So, who are reportable individuals? Students with disabilities who receive pre-employment transition services prior to applying and being determined eligible for VR services and receiving services under IPE are considered reportable individuals. These are the students who do not meet the definition of participants. So, they will only have pre-employment transition start date. They won't have an application date, IPE date, or VR service start date. Here are the list of elements that are required for individuals receiving only pre-employment transition services. Element 5, its Unique Identifier, element 6, Social Security Number, if available. Element 8, Date of Birth. Element 10 to 14 are Race. Element 15 is Ethnicity. Element 22, Student with Disability. Element 96, Start date of Pre-employment Transition Services, and element 97 to 124, actual Pre-employment Transition Services. And there are a few elements that gets reported with each record in each quarter like Program Year, Program Year Quarter, Date Report Submitted, and Agency Code.

Let's talk about participants. In accordance with 34 CFR. 361.150 (a) (1), for the purpose of the VR program, an individual is a participant if he or she has an approved IPE and is in receipt of VR services. For 911 purpose, individual would have applied, determined eligible, have an application with an eligibility date and IPE date, and VR service start date coded. So, when a student with disability applies and determined eligible for VR services, the VR service is required to report additional data elements associated with that individual, depending on what stage of VR process they are in. If they are at application stage, agency needs to report all the application data elements. Same with eligibility or IPE stage. Once the individual become participant, all VR services, including pre-employment transition services, needs to be provided under an approved IPE and reported accordingly. On data element 74, our definition of Age of Student with Disability, we just want to make sure that agency -- sorry. The age for student with disability needs to be same for both general and blind agencies, if a state has two agencies.

Let's talk about data element 22, Student with a Disability. So, data element 22 needs to be reported either at application or start date of pre-employment transition services, whichever comes first. Agency should have appropriate internal control in place for source documentation for all reported data elements. In case of student with disability elements, agency should have disability documents and enrollment in education program in the individual's case file. VR agency policies should establish the age range and documentation required in the case file. Internal control processes should ensure agency policies are accurately implemented. VR agency must update data element 22 when individuals age out or no longer meet the definition of a student with a disability. In the agency's pre-employment transition service dashboards, if the count of students with disabilities is significantly higher compared to the student receiving pre-employment transition services, what that means is that element 22 wasn't updated when individual aged out or no longer meets the definition of student with disability. We receive these questions a lot, so I just wanted to make sure I highlight data element 22 being updated.

All right, let's start with pre-employment transition services. Agencies should report when student with disability receive first pre-employment transition services. Reporting a date in 96 is required if student is receiving pre-employment transition services. Data element 96 is required, regardless of whether the student is potentially eligible for the VR program, has not applied, or the student has applied or been determined eligible for VR services or has an approved IPE for VR services, including pre-employment transition services. Agency must report the same start date of pre-employment transition services for the life of the case. What that means is, let's say a student with a disability receiving pre-employment services in Quarter One 2018, the start date -- if the start of employment/pre-employment services are 07-01-18, then agency should report same date, regardless of any break in service in subsequent quarters.

All right, let's talk pre-employment transition service data elements. For each of the five pre-employment transition service categories, a job exploration counseling, work-based learning experience, counseling on enrollment opportunities in comprehensive transition and postsecondary educational program at institutions of higher education, workplace readiness training, and instruction in self-advocacy. There are four corresponding data elements that may be reported in PD 19-03. So, what changed in PD 19-03? We eliminated two data elements for comparable services and benefits provider for each employment transition services, and we also eliminated code value 2 requirement to report when service was no longer being provided. So now, if the service is being provided, agency would need to code the element as 1. And if it's not provided, then they would leave it blank. Right? That means many data elements will be reported or remain blank if the individual is not in receipt of pre-employment transition service during the reporting quarter. For example, if the student is receiving job exploration counseling through VR agency in a quarter, the agency would report 1 as a code value for that data element, and all other 19 possible data elements would be blank. And here is the list of 12 data elements that needs to be reported every quarter regardless if the individual is in receipt of any services. And in the next two slides, we have a list of 20 elements, four elements for each service. Agency will report them when they provide service input in a particular quarter. Rachel?

**Rachel Anderson:** Thanks, Rimal. So, this next slide we really just wanted to take a break and look at the big picture of some of the things Rimal just talked about. So, in order for the agency to have been considered accurately reporting the provision of pre-employment transition services, there's multiple data elements that are going to come in to play. So, first off, an individual is identified as a student with a disability. This is regardless whether they're a reportable individual or a participant, and just as Rimal described, there's different things the agency has to consider and report for reportable individuals versus participants.

Then we also have to have a start date for those pre-employment transition services. Again, as Rimal said, this is for reportable individuals and for participants -- so across the board. Also, if any of the pre-employment transition services are being reported, just to reemphasize, there must be a start date. And I apologize to Rimal. I was messing with the slides when he was talking about this, but he did emphasize that they do see a lot of errors in this area where an agency may report a pre-employment transition service -- so one of those 20 potential data elements -- and they're missing a start date. So, we just really wanted to emphasize that they go together. You have to have a start date if you're providing any of those services.

And then, for quarterly reporting, VR must report also has applicable data elements, including the provision of any new or continued pre-employment transition services. If the student actually applies for VR, then make sure, again, as Rimal said, there's a whole additional set of data elements that the agency is responsible for reporting, such as application data elements, IPE data elements, et cetera. Just depending where they are at in the process. So, we just kind of wanted to bring it back together real quick to make sure everybody's kind of clear where we're at to this point.

So, we wanted to talk about comparable benefits for a minute because this is a pretty significant change for not only VR and how we've always provided and reported services, but specifically for pre-employment transition services. So, as Rimal said, RSA removed the requirement to report comparable benefits for all five required pre-employment transition services in PD 19-03, which means there's 10 fewer data elements required for the agency to report. So, service provided by comparable services or benefit providers, 101, 107, 113, 119, and 125. So, you'll see those are five data elements related to the five required services, and then again, for the benefits provider type. Now many of you, that might stress a little bit or cause some stress for you a little bit, but this doesn't take away from the agency's responsibility to have policies and procedures in place related to their collaboration with state and local education agencies to provide pre-employment transition services and transition services. So, we're just talking about the agency's requirement for reporting individualized services in the RSA-911.

So, this is just an example, a little snapshot from PD 19-03 in the RSA-911 report. So, this is job exploration counseling. So, with the two removed comparable benefits data elements, you'll see that we've got element number 97, which is job exploration counseling was provided by the VR agency staff in-house. We've got element number 98, which is the Service was Provided by Agency Purchase. We've got element 99, Purchased Service Provider Type. So, was it a CRP? Was it other? And then, data element 100, which is the VR Program Expenditure for Purchased Services. Now, obviously we're not covering when and how to report all of those. But if you remember from training two, we did talk about how these have different groupings that go together. So, if something is provided by VR agency in-house only, then those other three data elements, 98, 99, and 100, would be left blank because they don't apply. However, if an agency reports that this service was provided by agency purchase in element 98, then you also are required to report on 99, the Service Provider Type, and then when the expenditure is paid, you would also report on 100. So, just a little plug that if you haven't watched the previous training, it would be a good idea because it's very applicable to what we're talking about today.

So we want to run through a brief example of how this can look with starting and stopping services, because, as Rimal said, in the current version, in 16-04, there's a requirement to report code value 1 that they received a service, and then you're supposed to report code value 2 if they're no longer receiving the service. That's been a little bit tricky for agencies, and now in PD 19-03, it will be that you just leave them blank if they no longer apply or they never applied in the first place. So, we're just going to walk through a pretty broad level example here. So, for, let's say in Quarter One, the agency provided a student job exploration counseling as an in-house service. So, the VR counselor probably provided that, and they also provided them workplace readiness training. This, however, they purchased through, let's say, a CRP. You'll notice there's only two of the five required services here. So, the three that we haven't mentioned would just be just left blank because they don't apply. So, in the Quarter One RSA-911 report, job exploration counseling would be reported in data element 97 as code value 1, because it was provided to the student in that quarter, and then workplace readiness training would be documented in that quarter as well. And it would be data elements 116 through 118, whichever one of those happened to apply in that quarter. Again, I'm not going to get into the specifics. You'd want to go back to training two to learn more about that, but those are the specific data elements that would apply.

So then, moving on. The counselor did such a great job providing those job exploration counseling services, but in Quarter Two, they didn't need that service. They're just going to continue their workplace readiness training into the next quarter through that purchased service provider. So, in our Second Quarter RSA-911 report, job exploration counseling would now be blank because it no longer applies, but the agency would still be required to report the workplace readiness training purchase data elements.

Moving on to the next quarter, the agency now, let's say that the student finished the workplace readiness training. So, they no longer need that service, but the counselor needs to come back in and provide kind of that next level of job exploration counseling to continue to meet that student's needs. So, we report that one again in-house. And then, now that they've kind of moved on past just workplace readiness, the student's ready for a work-based learning experience, and in this example, the VR counselor has provided that experience through a purchased service. So, in the Quarter Three RSA-911 report, job exploration counseling now would be reported as code value 1 for data element 97, because, once again, we're providing that service in-house. You would probably have case documentation notes or other forms of documentation to show why that student needed those additional services. But just remember, we're only talking about what actually gets reported in the 911.

So, workplace readiness training, now that the student received that in the two quarters, in the third quarter, they're no longer receiving it, so the agency leaves that service blank in the 911. And now that we've added the additional service of work-based learning experience, now the agency would report the applicable purchased service data elements, which are 104 through 106.

Finally, in our example, we're moving onto the fourth quarter report, and in this quarter, the student no longer needed job exploration counseling because they're doing so great in their work-based learning experience, and it happens to cross quarters, or maybe they have an additional work-based learning experience because now they can work on a different set of skills or whatever the scenario may be. So, in the fourth quarter report, job exploration counseling would be left blank and workplace readiness training would be left blank, and the agency would only be reporting work-based learning experience through purchased services data elements. Now, remember, these are just the pre-employment transition services data elements. So, this would be *in addition* to all of those *other* required things that Rimal talked about, depending if the student was a reportable individual receiving services as a potentially eligible student, or if they were a participant receiving services under an IPE. So Rimal, I'm going to hand it back off to you to talk about exiting a potentially eligible student.

**Rimal Desai:** Thank you, Rachel. How the potentially eligible student will be recorded as closure. So, for a student with a disability who slowly received pre-employment transition services and who have not applied or been determined eligible to receive any other VR service, the service record remains open until the individual no longer meets the definition of student with disability. At that point, the agency cannot provide pre-employment transition services to the individual and RSA-911 reporting would end. What that means is the agency would need to keep reporting on the individual, even if they not receiving any pre-employment transition services, until they age out or they apply and receive services as the participants. However, if student with disability has applied and been determined eligible for VR services, the student's service record would be closed when student satisfies the definition of exit at 34 CFR 361.150(c). Then the agency can use the data element 353, Date of Exit, data element 354, Type of Exit, and data element 355, Reason for Exit, to record the closure.

So, what we made changes in PD 19-03. We deleted core value 9, potentially eligible individual exited after receiving pre-employment transition services and has not applied for VR services in data element 354, Type of Exit.

All right, let's talk, when does RSA-911 reporting end for potentially eligible students with disability? So in current PD 16-04, there would be data element 355 would have Date of Exit, 354, Type of Exit would be coded 8 for potentially eligible individual exited after receiving pre-employment transition services and has not applied for VR services, and code data element 355, Reason for Exit, would be coded with appropriate reasons for exit. But with new PD 19-03, RSA-911 reporting would end when individual no longer meets the definition of student with disability. Example: If individual would age out or is not enrolled in an education program and reporting of all expenditures has concluded. That way, data element 22 [INAUDIBLE]. That's why we would like agency to keep track of data element 22 and update them as necessary. Rachel?

**Rachel Anderson:** Thanks, Rimal. So, again, I know that this is a little bit overwhelming of information and pretty technical, so we kind of just want to give another example of how this looks for potentially eligible students only who are reportable individuals. So, as Rimal talked about already, we know that you have to report all the reportable individual data elements, as well as the student with disability data elements. And we did talk about earlier in the training that we're reporting the age range if they're a participant, but for potentially eligible, it's just that they are a student with a disability. So, you would have other mechanisms to track their age range and case notes or other type of documentation to document their enrollment status, to make sure that they do meet the definition of a student. But for here, you're just documenting that they are or not a student with disability.

Then we're reporting the start date and the provision of the pre-employment transition services. So, as we've discussed in the new PD 19-03, that will be in-house or purchased services only. So, there's another group of data elements that you're required to report on real-time. And then, in the quarterly report, how that would look is you're going to report when services are provided. You're going to leave them blank if the service was not provided, and as we discussed in our previous example, that would be if they're never provided, and also, if they are starting and stopping those services. It would just be blank if the service is not provided. But all of those previous data elements, remember that those carry over with the individual.

And then also just to talk about what Rimal just said with when the reporting ends, this is a little bit challenging to change our mindset on this one, but we understand in VR, we understand closures, and we're understanding exits, but with potentially eligible in the new PD 19-03, we almost have this new subset of individuals, and it's very different how we report them. So, as Rimal said, in the RSA-911 report, it ends when the individual is no longer meeting the definition of a student with a disability. So generally, we're closing the case out or they're exiting services, and we're kind of ending that story. But if you have students with disabilities who are being provided pre-employment transition services as a potentially eligible student, when all of the services are finished, and they're no longer meeting the definition of a student, you just leave those elements blank. You no longer have to report on them. Now, more often than not, it looks like agencies are having potentially eligible students apply for VR services. So, you're going to be reporting on all of those things anyway. But for potentially eligible only, if they move or they no longer are interested in receiving services, or you've provided such stellar pre-employment transition services that they truly don't need VR services, that's okay. You just stop reporting all those data elements on them when they no longer meet the definition of a student with a disability and all of those services and the funds have been expended.

So, just an example, some of you might be thinking, gosh, that's a long period of reporting, and it can be. So, say that you were providing services for a student who was 16 years old as a potentially eligible. Maybe our example previous. So, they received job exploration counseling, workplace readiness training, and a work-based learning experience of a 16-year-old student with a disability. And then, say that maybe they either told you that they no longer need any services or they just stopped contacting you, or they move, or something happened, so you're no longer providing those services. All of the pre-employment transition service data elements, those 20 that we've discussed, they might be blank in all of your quarterly reports, but you're still going to report on them as a reportable individual. So, if your agency's age range is 14 to 24, then the agency would essentially be reporting that they are still a student with a disability and a potentially eligible student until they age out or until you have verification that they're no longer enrolled in an education agency or they just don't meet the definition of a student with a disability anymore. I know, for some of your agencies, that's going to be a longer period of time, and for some of you, it'll be a shorter period of time. But we just wanted to try to make that clear that you're reporting on them now until they no longer meet that definition. Now some agencies have different policies on how they exit them currently. Some agencies already do that practice, so they report on them until they no longer meet the definition of a student with disability. Some agencies have policies that say, okay, if they're not receiving services for two subsequent quarters, then we're going to close them using that code value 8. But because that's going away in the future, agencies are going to have to amend their policies to just make sure that it's when they no longer meet the definition of a student with a disability.

Lastly, we want to hit on just a few key areas of internal control. So, you all probably have a good idea about this, but just to reemphasize. Internal controls should ensure accurate reporting, tracking and reporting of all VR services, including pre-employment transition services provided to students with disabilities through contracts or group services. So, we see a lot of agencies struggling with this, so we just wanted to make it clear that if you're providing a lot of your pre-employment transition services through contracts or group services, the agency is responsible for breaking those down by the student and reporting them in the 911 for every single student who is receiving pre-employment transition services. Also, if you've kind of bundled some of those payments, you also want to make sure you can provide, you know, which of the five or all of the five that each of those students received under those contracts or group services. Also, agencies should have internal controls to prevent them from providing pre-employment transition services to individuals who do not meet the definition of a student. Many agencies have some controls built in their case management system. Obviously, you have your policies and procedures in place as well, and then you likely have some human aspects with training and case-style reviews and other ways to ensure you're not providing those services to those that do not meet that definition. And then, this one is a repeat from our training last week, and I've got a link for you there so you can access it directly, but just a friendly reminder that data reporting internal controls should ensure that all VR services are listed on the IPE for participants or other documentations such as case notes and records for reportable individuals. And these controls should also ensure that VR services are not reported on the RSA-911 until they have been provided.

Okay, that's all that we have for you today. You may have additional questions, and so, we'll talk about that in just a second, but just a reminder, our next training that we will be launching sometime in November is going to be on supported employment services. And then, a future look, in December, we're going to be launching a training on measurable skill gains and credential attainment and exit and post-exit data elements for the RSA-911.

In this training, it's some of the same resources. So, we've got the comment analysis for you from the ICR. We gave this to you at the last training as well. This discusses many of the proposed changes and what happens in the development of PD 19-03, if you're interested. There's quite a few sections on pre-employment transition services. And then, also, again, for easy access, we've got 16-04, 19-03. And then, for those of you that maybe haven't seen it yet, the PD 19-03 case service report is now available in Excel file format, thanks to a lot of hard work by Rimal. So, thanks, Rimal.

Here is our contact information, and you can, as always, please reach out to your WINTAC contact for performance and reporting, if you need additional help. Also, your WINTAC contact for pre-employment transition services if you need help on the content side. Also, you can contact Rimal or whoever your data team liaison is or your RSA liaison for more content assistance. So, with that being said, Rimal, do you have anything else to add?

**Rimal Desai:** Sure, I just wanted to say thank you for tuning in, and as, again, as Rachel said, if you have any questions, you can always reach out to RSAdata.ed.gov, or, you know, contact WINTAC for further TA. Thank you.