

# TRANSITION



# 2015 FAQ

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# **TRANSITION DEFINITIONS AND MANDATES**

## **What is the definition of Transition Services?**

Transition Services facilitate and support the movement of high school students with disabilities into adult life activities. The primary role of MRS is to facilitate the Transition from school to employment. Employment-related activities must be coordinated with educational activities of the school (many of which relate to future employment) and with other agencies that are supporting students including but not limited to Michigan Department of Community Health (MDCHM), Disability Networks and Community Rehabilitation Organizations (CROs). MRS and the Michigan Department of Education/Office of Special Education (MDE/OSE) have a joint mandate to provide Transition Services.

The definition of Transition Services used by MRS in the current regulations is very similar to the definition used by the Department of Education; however, there is one difference. The definition used by MRS, includes language that is specific to vocational rehabilitation that is not referenced in the definition used by education.

According to the IDEA:

“The term Transition Services means a coordinated set of activities for a child with a disability that— (A) is designed to be within a results-oriented process, that is focused on improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities, including postsecondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation; (B) is based on the individual child's needs, taking into account the child's strengths, preferences, and interests; and (C) includes instruction, related services, community experiences, the development of employment and other post-school adult living objectives, and, when appropriate, acquisition of daily living skills and functional Vocational Evaluation.”

According to WIOA:

“Transition Services are a coordinated set of activities for a student or youth with a disability designed within an outcome-oriented process that promotes movement from school to post-school activities, including postsecondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation. The coordinated set of activities must be based upon the individual student's needs, taking into account the student's preferences and interests, and must include instruction, community experiences, the development of employment and other post-school adult living objectives, and, if appropriate, acquisition of daily living skills and functional Vocational Evaluation. Transition Services must promote or facilitate the achievement of the employment outcome identified in the student's IPE (Individualized Plan for Employment).”

In everyday language, Transition Services are services, programs and supports provided by schools, MRS and other agencies that create a coordinated and individualized process where students Transition out of high school and participate fully in adult life.

## **What is the IDEA and why is it so important to Transition?**

The IDEA is federal legislation that mandates a free appropriate public education (FAPE) in the least restrictive environment for children with disabilities. This law requires that planning and

activities occur to prepare individual students for adult life beginning no later than the first IEP to be in effect when the child is 16, and updated annually thereafter. The IDEA mandates that each student have an Individualized Education Program (IEP) that identifies appropriate Transition Services that are needed for the student. The IDEA was last amended in 2004.

### **What is WIOA?**

The Workforce Innovation and Opportunity Act (WIOA) was signed by President Obama on July 22, 2014. WIOA is a large bundle of federal legislation designed to help job seekers including individuals with disabilities access employment, education, training, and support services to succeed in the labor market and to match employers with the skilled workers they need to compete in the global economy. Congress passed the Act by a wide bipartisan majority; it is the first legislative reform in 15 years of the public workforce system.

WIOA is legislation that contains the vocational rehabilitation amendments. The Rehabilitation Services Administration (RSA) distributes funds to states to provide vocational rehabilitation services. Michigan Rehabilitation Services (MRS) and the Bureau of Service for Blind Persons (BSBP) are the vocational rehabilitation agencies in Michigan that receive these funds. RSA also provides direction and oversees how funds are spent to insure that the funds are being used in accordance with WIOA.

WIOA replaces the Workforce Investment Act of 1998 and amends the Adult Education and Family Literacy Act, the Wagner-Peyser Act, and the Rehabilitation Act of 1973. The vocational rehabilitation sections of WIOA took effect on July 22, 2014 with the exception of section 511 which is the subminimum wage provisions/restrictions which will take effect on July 22, 2016. It is anticipated that the final regulations implementing WIOA will be issued in the spring of 2016. Therefore this Transition FAQ document reflects where MRS is in the process of implementing WIOA.

The act requires that each year, MRS set aside 15% of the total Vocational Rehabilitation allotment to be used for Pre-Employment Transition Services (PETS) including:

- Job exploration counseling;
- 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 to the maximum extent possible;
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education;
- Workplace readiness training to develop social skills and independent living; and
- Instruction in self-advocacy, which may include peer mentoring.

## **ROLES AND RESPONSIBILITIES**

### **What is typically considered education's responsibility in Transition?**

Education provides Transition Services required under the IDEA and Michigan Rules to students with disabilities. These services may be provided in general, vocational/technical, and/or special education. These services typically include:

- Career exploration and preparation for post-school activities;
- Vocational/career technical training;
- Course of study that is aligned with the student's post-school vision (goals);
- In-school and community-based work experiences (paid or unpaid);



- Special transportation services; and
- Assistive technology, support services and equipment for use during school activities.

### **What is typically considered MRS' responsibility in Transition?**

MRS provides vocational rehabilitation services to eligible students as required to meet the employment goal identified in the Individual Plan for Employment (IPE). These services include:

- Provide Pre-Employment Transition Services (PETS) to Students with Disabilities prior to exit from secondary education
- Complete an IPE before eligible MRS customers exit school;
- Coordinate the IPE with the IEP or Section 504 plan;
- Plan for a seamless Transition to post-school employment outcomes;
- Arrange or conduct assessments and evaluations related to MRS eligibility and employment plan development;
- Provide vocational counseling to establish appropriate work goals;
- Identify, coordinate, fund or provide individualized rehabilitation services necessary to reach job goals; and
- Provide expertise regarding workplace adjustment and accommodations.

Examples of specific vocational rehabilitation services that can be coordinated, funded or provided are:

- Vocational Counseling;
- Vocational Assessment;
- Job skills training;
- Postsecondary education and training;
- Assistive technology;
- Job coaching; and/or
- Job development/placement.

### **What is the role of Intermediate School District (ISD) transition coordinators in the Transition process?**

ISD transition coordinators hired by Intermediate School Districts (ISDs) have knowledge about federal and state education laws, the IDEA, curriculum, best practice for providing quality Transition Services, models for the delivery of Transition Services and interagency collaboration. Transition coordinators are often involved in Transition program development. It is the role of the transition coordinator to share this knowledge with teachers and other staff as needed and requested by local districts, so that quality Transition Services lead to positive post-school outcomes for students.

Transition coordinators are also responsible for data collection for some of the state performance plan indicators and planning for improvement. They play a key role in making sure that local districts and staff are aware of educational responsibilities in providing Transition Services, the importance of collaboration with other agencies such as MRS, the documentation that is required to demonstrate that quality education and Transition Services are being provided, and monitoring data that tracks student post-school outcomes.

### **What is the role of MRS counselors in the Transition process?**

The primary role of the MRS counselor is to assist students through the rehabilitation process ultimately leading to employment. The job of a MRS counselor is rewarding and challenging. Many MRS counselors work with students transitioning from high school; some have exclusive Transition caseload assignments while others have split assignments, working only part time with

transitioning youth. Counselors that serve Students with Disabilities carry large caseloads. Often this means serving over 100 students at one time. Managing high caseloads is one of the challenges facing MRS counselors and requires hard work, organizational strategies and prioritization of work.

One of the most valuable skills that MRS counselors bring to the Transition process is vocational expertise and a “real world” perspective. This includes knowledge about vocational assessments that would be most appropriate for students; an understanding of different disabilities and how disability may impact employment; a broad understanding of the many types of jobs that individuals may want to pursue; and expertise about the career outlook in Michigan.

The vocational rehabilitation process includes a Comprehensive Assessment of Rehabilitation Needs (CARN) that is conducted by the counselor to identify barriers to employment and the services necessary to remove barriers. The student and the counselor will work together to select a job goal and will develop an Individualized Plan for Employment (IPE) which delineates the supports and services that the student needs to be successful.

Another area of expertise that MRS counselors provide relates to postsecondary and employment accommodations. Many young people are unaware of the challenges that lay before them to be successful in postsecondary education settings and employment. They aren't sure what accommodations to ask for or how to go about requesting them. MRS counselors help bridge the gap from high school where teachers actively support students, to the world outside of high school where young people must learn to advocate for themselves to be successful.

The counseling alliance between MRS counselors and students cannot be understated. Students report over and over again that it is the relationship with their counselor that they value the most. Students often report that it is helpful to have a knowledgeable person to turn to and that they appreciate that someone is available to help. Counselors serve an important function to provide support and guidance to students as they Transition from the school setting into the adult world and ultimately employment.

MRS Counselors also link students to other resources in the community that may be helpful to them. The adult system is complicated and often difficult to navigate. MRS Counselors stay abreast of what different agencies offer and what linkages would be most advantageous for students to pursue. They often advocate on behalf of students and make community connections such as the Department of Community Health, the Department of Human Services, Postsecondary Disability Support Services, Disability Networks, AmeriCorps, Michigan Works! and/or volunteer organizations.

**What are the responsibilities of other agencies (MDCH, MDHS, MWAs, Disability Networks, etc.) in the provision of Transition Services and how can counselors and schools best use these resources?**

Several agencies have roles in Transition depending upon student's disabilities, vocational goals, and independent living needs, as well as other unique factors. These agencies may include the Department of Community Health, Department of Human Services, Disability Networks, and Michigan Works! Each agency has some statutory provisions and/or service policies about their role in providing supports and services to Students with Disabilities.

IDEA requires that related services be considered during an IEP. These related services may be provided by agencies and individuals outside of the educational system. When agencies come

together and collaborate with education to support student's unique Transition needs and goals, students are more likely to be successful in employment.

IDEA also requires that the Local Education Agency (LEA) invite agencies to the student's IEP who are likely to pay for or provide Transition Services to students. The law stops short of requiring attendance by those identified agencies.

To best use community resources, MRS counselors and school staff must be familiar with the services available in their community by linking and communicating with partners, learning about programs, and developing collaborative, positive relationships. It is helpful when collaborative partners learn about and understand eligibility requirements; scope of services that can be provided; and the challenges and real limitations of each agency.

### **What is the Michigan Transition Outcomes Project?**

As of October 1, 2015, MI-TOP has closed out. Michigan Department of Education, Office of Special Education is providing guidance and direction regarding Transition throughout the State.

### **What is Michigan Transition Services Association?**

Michigan Transition Services Association (MTSA) is nonprofit organization dedicated to providing support to members who assist students and young adults with disabilities as they Transition through school to achieve their post-school goals.

MTSA hosts the premiere Transition conference in Michigan which takes place in March of every year and offers fifty plus learning opportunities on all aspects of Transition. The conference has an awards banquet where the prestigious David Anderson Award is bestowed upon the winner. The award is given to an individual who has made a difference in the lives of Students with Disabilities.

MTSA partners with MRS to support the MRS and MTSA Collaborative Project which provides funding for work-based learning projects in local communities.

### **How is it decided whether MRS or schools are responsible to fund Transition Services for a student?**

Because MRS and education have a shared mandate to provide Transition Services, there are gray areas where either partner may fund or provide similar services. A school district may agree to fund a student's Vocational Assessment as part of FAPE. In another situation, MRS may agree to fund a student's Vocational Assessment because specific information is essential in developing the student's IPE.

MRS is responsible for the provision of PETS and other vocational rehabilitation services to meet an IPE employment goal. MRS services will vary from student to student and school to school depending upon individual needs and available resources. Prior to exit from high school, MRS is responsible for the provision of services directly related to the achievement of the IPE job goal. Under WIOA, MRS is not allowed to provide services that are the responsibility of education under IDEA.

Dialogue between MRS and school partners should be ongoing to help clarify roles and responsibilities of each partner. Once a student earns their high school diploma or ages out at age 26, the school no longer has any responsibility. MRS has responsibility beyond high school

and coordinates, provides or funds vocational rehabilitation services for the student as they progress through the vocational rehabilitation process toward employment.

## **EDUCATION AND MRS PARTNERSHIP**

### **How can MRS and schools best work together to help students achieve employment?**

Building relationships between schools and MRS is imperative to build a seamless Transition process for students. Productive partnerships are based on mutual respect and understanding of the challenges and responsibilities of each respective partner. Like all relationships, partnerships between schools and MRS take effort, communication, mutual investment and ongoing evaluation. Effective collaboration is worth the effort because when schools and MRS work together, valuable resources are expanded and students are more likely to achieve employment.

Most education and MRS partnerships have local written agreements. Each year the agreements are reviewed by education and MRS which is a great opportunity to dialogue and improve the partnership. Both partners have the opportunity to bring up issues or concerns and come to mutual understanding regarding the provision of vocational rehabilitation services for students.

Written agreements have goals attached to them that may include the number of students that will be referred to MRS, the number that will be determined eligible, how many IPEs will be developed and how many students will become employed. Touching base during the year to assess progress toward these goals is an excellent practice. Many school and MRS partners get together several times a year to share information, evaluate how things are going, and make necessary adjustments.

### **What cost sharing agreements are available through MRS?**

**Interagency Cash Transfer Agreements (ICTAs)** may be established to use local non-Federal dollars as the required share necessary to secure Federal matching dollars. The resulting funds may be used for the provision of vocational rehabilitation services to serve students with disabilities. ICTAs were formally known as "cash match" agreements.

An ICTA is created to enhance or improve the provision of vocational rehabilitation services to eligible individuals. Public agencies (such as schools or ISDs) contribute non-federal funds that are used by MRS to capture federal funds. The resulting funds are used by MRS to provide individualized vocational rehabilitation services leading to employment for students with disabilities.

A formula (27% non-Federal to 73% Federal) is used to determine funding amounts. In other words, every local dollar put forward as local share captures close to 3 Federal dollars. One of the restrictions placed on the local dollars is that they must not be Federal dollars. In other words, Federal dollars cannot be used as match to secure more Federal dollars.

ICTAs specify the amount of funds in the agreement, roles and responsibilities of partners and the goals for each year. Expectations of the working relationship between MRS and schools are often detailed in the agreement. Agreements are reviewed and updated each year.

**Third Party Cooperative Arrangements (TPCAs)** are agreements which utilize staff provided by public agency partners to deliver vocational rehabilitation services. The match formula amounts are the same as an ICTA, but the process is slightly different. The non-Federal share equals the individual's wage (less benefits) multiplied by the time devoted to service delivery.

The total (wage x time) is confirmed or certified by MRS and put forward to draw down Federal matching funds

The Federal dollars that are earned by the MRS via TPCA's are distributed on an equitable basis among all local district offices. These resources are used in support of vocational rehabilitation services to individuals with disabilities, including those of the certified expenditure match partner.

**Private Contributions** are funds received by MRS from private individuals or organizations. These funds are used by MRS to secure Federal matching dollars.

MRS is ultimately responsible for the management and utilization of funds that are generated through cost sharing agreements. Once local funds are pooled with matching federal dollars, they become the responsibility of MRS and must adhere to MRS rules, regulations and policy as directed by the Rehabilitation Act. Some school districts ask MRS to report on the local portion of the funds to ensure that those funds were spent on Transition Youth while they are still in secondary education.

### **Why are there differences between the provision of vocational rehabilitation services and Transition Services in different areas of the state?**

Even though the requirements of the IDEA and WIOA are the same for the whole state, each community is different and offers unique opportunities and challenges. Funding and community resources that are available to provide vocational rehabilitation services vary from one community to the next. Some schools offer Transition programs that other schools do not. MRS has collaborative programs in some communities, but not in others. Each community has the opportunity and responsibility to access and develop effective programs to meet the needs of their students.

### **Can MRS vocational rehabilitation services be provided to students when there is no ICTA?**

Yes. However ICTAs allow MRS to provide expanded and improved services. Without an ICTA, MRS services are provided somewhat differently. ICTAs allow MRS to increase capacity to serve eligible students and often allow MRS to provide students additional services and supports.

When there is no ICTA, it is still important that educators and MRS staff work together to reach agreement on how to best support Students with Disabilities. While the absence of an ICTA may impact available resources, it does not lessen the shared responsibility to provide Transition Services to students.

### **Can ICTA funds be used for students who have exited high school?**

Yes. ICTA funds are intended to be used to facilitate the Transition of youth from high school into employment and, therefore, by necessity will be used not only while students are in high school, but after they graduate or exit as well. Some MRS district offices choose to make a clear distinction with the school district when purchasing rehabilitation services; spending the local portion of the funds on in-school youth and MRS federal dollars for services on students that are post exit from high school, although the local match and federal dollars are, in fact, pooled.

### **How does MRS define Youth?**

#### **“Student with a Disability”: (Enrolled in K-12 Education System)**

- Age 14-26 at application **and**

- Enrolled in the K-12 education system including traditional public schools, intermediate school districts, private schools, charter schools (public school academies), alternative schools, schools for individuals with disabilities such as the Michigan School for the Deaf, 504 students, home-schooled students and students in education programs in correctional facilities.

**“Youth with a Disability”:** (NOT Enrolled in K-12 Education System)

- Age 14-24 at application **and**
- **Not** enrolled in the K-12 education system including traditional public schools, intermediate school districts, private schools, charter schools (public school academies), alternative schools, schools for individuals with disabilities such as the Michigan School for the Deaf, 504 students, home-schooled students and students in education programs in correctional facilities.

**Can school districts "hold" diplomas when a student has met the graduation requirements under the Michigan Merit Curriculum (MMC) to provide additional Transition Services?**

The simple answer to this question is no. When students have passed classes that are required for them to earn their high school diploma, the diploma must be granted. In the past, school districts have sometimes taken latitude with this rule and have held diplomas. In recent years, the MDE/OSE has made this rule clearer to local districts. If it is thought that a student would benefit from an additional year of school, plan carefully to delay completing at least one required class until the student plans to exit from school.

**What options do students have to complete their requirements to earn their high school diploma when they are 19 years old plus?**

There may be some creative school programming that limits or eliminates student attendance in the traditional secondary setting. Some options include but are not limited to:

- Alternative schools,
- Dual enrollment at a community college or university,
- Vocational training at a secondary school voc-tech program,
- Distance learning, or
- Work experience such as an on-the-job training (OJT) arrangement.

**Can a student who exited with a certificate of attendance/completion or a GED return to high school to earn their high school diploma?**

Yes. Up until age 26 students with IEPs that have left high school without a diploma can return to work towards completion of their diploma. A certificate of attendance/completion is not recognized by the Michigan Department of Education and it is not equivalent to a high school diploma. A GED is also not the same as a high school diploma. The challenge will be to find an educational setting within the K-12 system that is appropriate for the student. Most students who are between the ages of 18 – 26 do not want to attend the traditional high school.

**What is Response to Intervention (RTI)?**

RTI integrates assessment and intervention within a school-wide, multi-level prevention system to maximize student achievement and reduce behavior problems. With RTI, schools identify students at risk for poor learning outcomes, monitor student progress, provide evidence-based interventions, and adjust the intensity and nature of those interventions based on a student's responsiveness.

In addition, RTI may be used as part of the determination process for identifying students with specific learning disabilities or other disabilities.

### **What Special Education State Performance Plan (SPP) Indicators relate the most to Students with Disabilities?**

The IDEA requires that each state have a State Performance Plan (SPP) that evaluates efforts to implement the requirements and purposes of Part B of IDEA and describes how the state will improve such implementation. The SPP, submitted every six years, includes measurable and rigorous targets for the 20 indicators established. The state must file an Annual Performance Report (APR) to report on progress each year.

Indicators 1,2,13 and 14 directly impact student readiness for life after high school.

#### √ Indicator 1 – Graduation

Percent of youth with individualized education programs (IEPs) graduating from high school with a regular diploma.

#### √ Indicator 2 – Dropout

Percent of youth with individualized education programs (IEPs) dropping out of high school.

#### √ Indicator 13 – Secondary Transition

Percent of youth with individualized education programs (IEPs) aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, Transition Services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student's transition service needs. There also must be evidence that the student was invited to the IEP Team meeting where Transition Services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority.

#### √ Indicator 14 – Postsecondary Outcomes

Percent of youth, who are no longer in secondary school, had individualized education programs (IEPs) in effect at the time they left school, and were:

- A. Enrolled in higher education within one year of leaving high school.
- B. Enrolled in higher education or competitively employed within one year of leaving high school.
- C. Enrolled in higher education or in some other postsecondary education or training program; or competitively employed or in some other employment within one year of leaving high school.

### **What should happen if there are disagreements between school staff and MRS?**

Education and MRS often view things differently and rigorous dialogue is common. It is incumbent upon all individuals involved to invest in the partnership and keep the working relationship positive. Cooperation may be hampered by a lack of understanding of the limitations and realities under which professionals from different agencies work. At other times,

there is not a clear understanding of how cooperation will benefit education, schools, and ultimately students.

It is the responsibility of all parties to take a role in fostering cooperative relationships to promote successful Transition programs. Strategies to support the development of collaboration at the local level include annual meetings between MRS managers, counselors, and special educators and/or participation in joint training sessions. In difficult situations, mediation may be helpful, provided by a supervisor, manager or consultant.

### **What are MRS “Purchased Service Providers”?**

"Purchased Service Providers" are non-MRS employees who provide vocational rehabilitation services to MRS customers, under MRS supervision, with the purpose of assisting persons with disabilities to achieve their employment goals and independence. For example, a Purchased Service Provider may work for a school district or a Community Rehabilitation Organization and work closely with MRS by providing vocational rehabilitation services to students.

### **What are some strategies that schools and MRS can use to support MRS involvement in student IEPs?**

MRS participation in IEPs enhances the student Transition process in a variety of ways. IEPs are a great opportunity for counselors to learn about a student's strengths and postsecondary goals. Counselors can share critical information about the role of MRS and the world of work to promote a seamless Transition for student success.

However, MRS attendance at IEPs can be a challenge in many communities for several reasons including the size of MRS caseloads, the demands of counselor caseloads and/or the geographic area that a MRS counselor is assigned.

The MDE/OSE and MRS Interagency Agreement states that each LEA is required by the IDEA to invite MRS to the IEP Team meeting if it is anticipated that, "MRS is likely to provide or pay for services for the student." It also states that, "MRS agrees to make every effort to attend the student IEP for eligible MRS students".

Often misunderstandings occur in the invitation process when schools invite MRS to IEPs. Schools and MRS counselors should work together to address possible options available such as:

- Planning in advance to discuss the reasons MRS participation is needed and to determine available times that work for the counselor;
- Scheduling multiple IEPs in a block to maximize MRS travel time and time in the school;
- Discussing MRS issues at the beginning of the meeting by starting with the postsecondary goals so the MRS counselor has the option of attending the entire meeting or just part of the meeting;
- Using the Outlook calendar meeting request option or the Meeting Wizard available on the internet to schedule meetings when everyone is available;
- Giving the MRS counselor advance notice (often MRS counselor's schedules fill-up weeks in advance);
- Spreading IEPs throughout the whole year to avoid "IEP season"; and
- Utilizing a call-in option for MRS counselors.

Another alternative(s) for coping with the logistical demands of IEPs is to use other opportunities to bring students, families, teachers, and MRS counselors together. IEPs are important but there are many other ways to meet and interact with students. Many MRS counselors provide information about MRS during parent/teacher conferences, evening activities, Transition fairs,



etc. Students often meet with their MRS counselor several times during the year to develop their IPE outside of the official IEP meeting. Students may be able to present their IPE at their IEP without the MRS counselor needing to be there.

### **Can MRS attend an IEP for a student who is a minor without parent/guardian consent?**

Yes and no. Education has a rule that agency representatives cannot attend IEPs without parent/guardian consent. MRS does not have this rule. Therefore in situations where MRS attends an IEP and the school has not obtained parental consent, the school is in violation of their policy, MRS is not in violation of MRS policy.

### **How can orientations be provided to Students with Disabilities?**

While students with disabilities are in high school they should have several chances to learn about MRS services. Information about MRS can be provided formally or informally in a variety of ways including MRS pamphlets, MRS website, school programs such as job fairs, parent teacher conferences, IEPs (teachers or MRS staff could provide basic MRS information), etc. Early on in a student's high school education, the most important connection and understanding that students need to have about MRS is that MRS helps students with disabilities achieve employment. A positive feeling about MRS and the MRS counselor lays the foundation for a future productive relationship. Overwhelming students early on in their high school career with information that is not relevant to them works against establishing positive relationships in the future.

Orientations can be provided to students in a group, one on one, or on-line. The benefit of providing individualized orientation is that the counselor can tailor the information to meet the needs of that particular student.

On-line orientations are available at: [www.michigan.gov/dhs/](http://www.michigan.gov/dhs/)

## **REFERRALS TO MRS**

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### **How can schools best determine who should be referred to MRS?**

MRS Managers and Counselors should work closely with school personnel to develop a referral process and facilitate timely referrals. A student with a disability, that desires an employment outcome and will require vocational rehabilitation services to achieve employment, may be referred to MRS when they are ready to engage in PETS and the vocational rehabilitation process. Ongoing communication between MRS and schools is essential for a positive referral relationship and process.

### **How early should a student be referred to MRS?**

Before a student is referred to MRS, a counselor may attend a student's IEP as early as age 14, to provide information. When the student is able to participate in the vocational rehabilitation process, they may be referred to MRS. In most cases, MRS will become involved during the last two to three years of high school. In some situations, a student's unique needs will require MRS to become involved earlier.

### **What documentation should school staff provide to MRS when they refer students?**

At a minimum, MRS counselors need documentation regarding a student's disability to assess eligibility for services. Other school records are extremely helpful in planning for vocational

rehabilitation services that a student may require. The following documents and school records are needed if they are available and applicable:

- Signed release of information,
- Copy of driver's license,
- Copy of social security card,
- Most recent psychological assessment,
- Medical information documenting disabilities,
- Most recent IEP,
- Review of Existing Evaluation Data (REED),
- Vocational Assessment reports,
- EDP,
- Work evaluation reports,
- Social work reports,
- Speech and language reports,
- Occupational therapy reports,
- Physical therapy reports,
- Present Level of Academic Achievement and Functional Performance (PLAFFP) statements in the IEP, and
- Summary of Performance (SOP).

After making the initial referral, it is helpful for school staff to forward additional documents as they become available or as information is updated.

**In order for MRS and schools to release and exchange student information, is it necessary to have a signed release?**

Yes. Both education and MRS requires a release from the student if they are 18 or older and their own guardian or from their parent/guardian to request information and to share information.

**Can students with disabilities receive MRS services if they are not a student with an IEP?**

Yes. Students with disabilities who do not require special education services may have and are entitled to a 504 Plan if they require accommodations. The plan may or may not specify "Transition Services" depending on the needs of the student. If a student with a 504 plan is determined eligible for MRS Services, the IPE should be coordinated with the 504 plan.

If a student is not currently eligible for special education, MRS eligibility is based on the same eligibility criteria that are used for all MRS customers.

**Can students with disabilities attending private, alternative, charter or home schools be referred to MRS?**

Yes. MRS vocational rehabilitation services are available to all eligible students regardless of whether or not they are attending public, private, alternative charter, or home schools. MRS counselors can access ICTA funds to purchase services if there is an ICTA in the same community where the student attends school.

Private, charter and home schools tend to have less developed Transition programming than public schools. Because of this it is important that MRS counselors remember not to supplant the responsibility of the school to provide Transition Services under the IDEA.

## **How should counselors handle referrals of students who are covered through Auto No-Fault Insurance?**

When MRS receives a referral for a student who is covered through Auto No-Fault Insurance, there are two scenarios:

- A student has a preexisting disability prior to the auto accident; and
- A student does not have a preexisting disability.

In both situations, counselors should contact the MRS Business Network Unit (BNU) for assistance regarding the responsibility of the insurance company and MRS.

If there are pre-existing disabilities that are not covered by no-fault insurance, a dual case can be established assuming the student desires employment and requires MRS services to achieve employment. In dual cases, rehabilitation costs are shared with the insurance company and MRS. For example, if a student with a developmental disability is involved in an automobile accident and must use a wheelchair as a result, no-fault insurance should be involved. However, the insurance carrier is not responsible for addressing functional limitations resulting from the developmental disability (i.e., non-compensable injury). Therefore, the person may still be eligible for MRS services (general program) while at the same time receiving VR services related to the auto accident injury (i.e., compensable injury) through BNU and paid for by the insurance carrier.

In the second scenario, when the student has no preexisting disability, but becomes disabled as the result of an auto accident, insurance companies often dispute vocational rehabilitation costs because the student has no established work history. In this type of situation, another type of dual case can be considered. When it is agreed upon by the insurance carrier and MRS counselor that there will be a dual case, the dual case will be managed by a nurse case manager and/or insurance adjuster from the insurance carrier and the MRS counselor. However, circumstances have occurred in the past where the MRS-BNU staff person is approved by the insurance carrier to open the case for VR services, therefore the case would not be serviced by the general program.

In both cases, the insurance carrier has primary responsibility for vocational rehabilitation costs when the disability is due to a motor vehicle accident. Counselors, BNU staff, as well as educational partners, must work jointly to ensure that schools and MRS are not supplanting the carrier's legal responsibility in services provided. Good communication between all concerned, including the insurer and the student and their family, is important to ensure appropriate Transition Services for the student are provided. A good rule of thumb to consider, any transition case that appears to involve an auto accident regardless of when it occurred should be screened through BNU to help determine if there is third-party liability involved.

### **Can MRS accept a list of student names that are potential referrals without a release?**

MRS can accept a list of names from school staff, but school staff should obtain written informed consent to give out the student names to MRS.

### **Can resident aliens be referred to MRS when they do not have an employment visa that legally permits them to work in the United States?**

No. The purpose of the vocational rehabilitation program is employment. Individuals who have a student visa only are not considered to have a work visa. There are many types of visa and MRS would work only with those who are eligible to become employed within the U.S. To

inquire visa status, obtain a copy of the individual's visa and check the following web site that has a breakdown of the legal differences: <https://egov.uscis.gov/cris/Dashboard.do>

### **If a student requires an interpreter to apply for MRS, is it the school or MRS responsibility to provide one?**

When the school asks MRS to meet with a student to inform them about MRS services, it is the responsibility of the school to provide an interpreter.

If the student has an open MRS file and a counselor is meeting with the student to conduct MRS business, then it is the responsibility of MRS to provide the interpreter.

### **When a student should be referred to the Bureau of Services for Blind Persons (BSBP) vs. when should a student is referred to Michigan Rehabilitation Services (MRS)?**

BSBP provides vocational rehabilitation services to eligible students who are legally blind. MRS provides services to all other eligible students with disabilities.

## **ELIGIBILITY FOR MRS**

### **Are all students in special education eligible for MRS services?**

No. If a student does not require MRS services to become employed, he or she is not eligible for MRS services even if the student is eligible for special education. In addition, if a student does not desire to become employed or if the services that the school is providing adequately address the needs of the student, they are not an appropriate candidate for MRS services. Students are determined eligible for MRS based on the following criteria:

- Existence of a physical or mental impairment (presumed for students with a current IEP),
- Substantial impediment to employment (presumed for students with a current IEP),
- Requires MRS services to prepare for, secure, retain or regain employment, and
- Be able to benefit from MRS services unless it is determined unable to benefit by clear and convincing evidence that they are unable to benefit.

### **What is the difference between entitlement for special education services and eligibility for vocational rehabilitation services?**

Students are entitled to a Free Appropriate Public Education (FAPE) in the least restrictive environment meaning that all students with disabilities in Michigan have the right to receive an education. Students have the right to apply for MRS but must meet the eligibility criteria to receive those services. The services students are eligible for will vary depending on individual needs. Students may lose their eligibility by not keeping appointments, not meeting agreements made in their IPE and not staying in touch with their counselor. This distinction between entitlement and eligibility is significant and is a shift for students and their families who are accustomed to functioning under an entitlement system. It is the role of educators and counselors to inform students and families about this difference, so students and families understand new processes and responsibilities that are part of eligibility-based systems.

### **How do school psychologists diagnose Specific Learning Disabilities (SLD)?**

In Michigan, prior to the 2004 reauthorization of the IDEA, the identification of a student suspected to have a SLD was based on the discrepancy model. The 2004 reauthorization of the IDEA expressly prohibited states from requiring the singular use of the discrepancy model. As a result, the criteria for determining SLD eligibility was revised in 2006 that provides schools with

some choices. Those choices include the use of methods for determining SLD eligibility based on scientific, research-based interventions and patterns of strengths and weaknesses. Consistent with the IDEA federal regulations at 34 CFR § 300.309 and the Michigan Administrative Rules for Special Education (MARSE) at R 340.1713, schools must use the following processes for determining the existence of a SLD:

- A student's response to scientific, research-based intervention and
- A pattern of strengths and weaknesses.

### **What can a MRS counselor do to obtain needed eligibility documentation for students with SLD when the school has adopted the Response to Intervention (RTI) model?**

MRS policy still requires that MRS have documentation of discrepancy between the IQ and achievement to determine that a student has a SLD. Even though education has moved away from the use of the discrepancy model, documentation of the discrepancy is often noted in school psychological evaluations. If available school documents or medical documents do not show the discrepancy, MRS may purchase updated psychological testing.

### **What is a typical timeline for determining MRS eligibility for students?**

If school records are available describing disabilities and substantial impediments to employment, and students are found to require MRS services, eligibility determination is made within the 60-day time frame for Eligibility Determination. The intent of the Rehabilitation Act, in encouraging the use of existing data, is to reduce the time required for eligibility determination. New information can always be added and integrated into eligibility considerations as time goes on. It may be necessary to conduct new evaluations to determine eligibility and to have the information needed to determine appropriate vocational rehabilitation services.

### **Can students be made eligible for MRS if it is anticipated that they will only be able to work part-time?**

Yes. MRS works to employ people with disabilities at the highest level that is appropriate for them. Each individual referred to MRS is evaluated for services on a case by case basis. MRS can close cases successfully rehabilitated when individuals work less than 20 hours per week if their situation is such that they are working at their capacity. Many customers with whom MRS works fall into this category. Often these individuals draw social security and receive Medicaid benefits at the same time as they maintain part-time employment.

### **Are there requirements regarding the age of psychological reports that can be used by MRS to determine eligibility for services?**

In order to determine eligibility for services MRS needs documentation of a student's disability. In many cases this includes a psychological report that was developed by a licensed school psychologist. However due to changes to IDEA, psychological reports are no longer required to be updated every three years like they were in the past. If the psychologist and the IEP team feel that the information in the old psychological report is accurate and relevant to the student, the team conducts a Review of Existing Evaluation Data (REED) in lieu of conducting updated testing.

MRS counselors can utilize old psychological reports as long as the information is relevant to the student's current functioning levels. Additional documents provided by the school can be helpful by providing additional work-related information. If the MRS counselor has determined that it is necessary to obtain updated psychological testing to conduct vocational planning, they can always ask the school to update the testing and sometimes the school will do so.

Ultimately however, it is the responsibility of MRS to purchase and coordinate any updated testing that the school has determined to be unnecessary and that MRS feels to be necessary.

### **Does MRS ever determine that a student is “unemployable?”**

No. In order for MRS applicants to be eligible for services, MRS must determine that an individual can benefit from services in terms of achievement of a competitive employment outcome. In order for a Student with a Disability to be determined ineligible, based on an inability to benefit, MRS must have clear and convincing evidence to make this determination. This could be due to an unstable health condition, lack of desire to obtain work, or an individual's unique circumstances. When this occurs, MRS may determine that an individual is “not able to benefit” from MRS at this time. This does not mean that this individual will never work. The individual can reapply for services when their situation has improved. The individual may also be able to achieve employment accessing supports and services from another agency. What school documents can be used to determine a student's disability and functional abilities?

There are many different documents that schools generate for students depending upon the student disability and the IEP. Because this question is so complex, a job aide is attached to the back of the FAQ titled, “SCHOOL DOCUMENTS.”

Evidence of eligibility for Special Education presumes only that the applicant has a physical or mental impairment and a substantial impediment to employment. The counselor must still determine whether the individual requires vocational rehabilitation services to achieve an employment outcome consistent with ability and capability.

## **VOCATIONAL PLANNING**

### **What are Pre-Employment Transition Services that can be provided by MRS?**

- Job exploration counseling;
- 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 to the maximum extent possible;
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education;
- Workplace readiness training to develop social skills and independent living; and
- Instruction in self-advocacy, which may include peer mentoring.

### **What is the MRS Comprehensive Assessment of Rehabilitation Needs?**

A vocational rehabilitation Comprehensive Assessment of Rehabilitation Needs (CARN) Assessment is a process conducted by the MRS counselor to determine the goals, nature and scope of rehabilitation services to be included in the IPE. Existing student information is used to the greatest extent possible but sometimes additional information is needed which results in the counselor providing or purchasing additional assessments for the student. Examples may include but are not limited to:

- Psychological/Neuropsychological Evaluation,
- Vocational Assessments/Evaluation,
- Independent Living Assessment,
- Assistive Technology Assessment, and/or
- On-the-Job Evaluation.

## **What is a Transition Assessment?**

A Transition Assessment is an ongoing process of collecting data on the individual's needs, preferences, and interests as they relate to the demands of current and future working, educational, living, and personal and social environments. Assessment data serve as the common thread in the transition process and form the basis for defining goals and services to be included in the Individualized Education Program (IEP).

Transition Assessments are holistic assessments of student overall functioning and are:

- A process of gathering information, which helps each student set goals, establish learning targets and learning progressions that lead towards their desired postsecondary goals;
- Not a one time or annual event – information needs change as students become more focused on their postsecondary goals;
- Multiple informants to avoid bias: Student, parent and teacher must be included as informants at minimum;
- Usually more than one tool to provide all the needed information for all students in any one class, school or district; and
- Completed for all students with an IEP. An initial assessment may indicate an area(s) of need for more in-depth assessments, IEP goals, Transition Services and/or Transition activities.

## **What are the differences between Transition Assessments and Vocational Assessments?**

A Transition Assessment is a planned, continuous process of obtaining, organizing, and using information to assist individuals with disabilities of all ages and their families in making critical Transitions in students' lives in the areas of employment, education, training and adult living. Vocational Assessments/Evaluations focus more on determining a student's strengths, interests, aptitudes, abilities, priorities and capabilities as it relates to job goal selection.

Vocational Assessment/evaluation is a component of a Transition assessment that helps define career interests, employability skills, career values, abilities and aptitudes. Depending upon what tools are used, Vocational Assessments can also serve to predict what supports a student will need to be successful in the workplace.

## **What is the EDP and how can it be used in Vocational Planning?**

An EDP documents the ongoing process in which students identify career goals and a plan of action to achieve them. All students have an EDP including students with disabilities. Students develop their first EDP in middle school, identifying an initial career goal and educational experiences. The purpose of the EDP is to provide every student with a guide or map to take effective steps to reach their career goals. For example if a student plans to be a nurse, they should be taking biology, chemistry and advanced math to help them prepare for their future coursework in postsecondary training. Students, parents and/or guardians and school counselors use the EDP to direct the course of study that the student is taking based on career exploration, career assessment information, school performance, and expressed interests.

Students IEPs should build upon the EDP and the IPE should be coordinated with the EDP and the IPE as appropriate.

## **Are schools responsible to provide Vocational Assessments/Evaluations?**

When Vocational Assessments/Evaluations are determined necessary and written into the IEP, the IEP must indicate which entity (school or agency) is responsible to provide the service. When the purpose of the Vocational Assessment is to advance FAPE in the least restrictive environment, then the school is responsible to provide the service. When Vocational Assessments that have already been completed do not provide the information needed to determine appropriate vocational rehabilitation supports, services and goals, then the Vocational Assessment can be funded by MRS. Vocational Assessment is one area where there is frequent overlap of responsibility between schools and MRS.

### **How do schools and MRS provide Vocational Assessments to students?**

Under the IDEA and the Rehab Act, schools and MRS both have a responsibility to provide vocational assessments to students with disabilities. When students are still in high school, the school has the primary responsibility to provide vocational assessments. MRS has the responsibility to add to and build upon the assessments that have already been provided if the student needs additional assessment to determine their job goal and the supports and services that are necessary. Quality vocational assessment experiences are the foundation for meaningful vocational planning and ultimately quality outcomes for students.

Vocational Assessments come in all shapes and sizes. Standardized vocational assessments and interest inventories provide a good starting point for gathering information about student strengths and interests. The important thing to remember is that vocational assessments are not just one test. Students are constantly changing during their high school years, go through many different developmental and readiness stages and may require many opportunities to explore careers and take stock of their interests and strengths. Young people are often limited by their narrow scope of careers. They often learn about careers through experiences with their family and through experience in their environment. This limited perspective is normal for young people because they haven't had the experiences necessary to broaden their view. This becomes an essential function of schools and MRS – to give students multiple opportunities that are developmentally appropriate so students can discover their interests, aptitudes and abilities and learn about careers and realize their employment goal.

Together, schools and MRS can provide a variety of vocational assessments and experiences such as:

- Student and Parent Interviews
- Employer Interviews
- Job Shadows
- On-the-job evaluation (OJE)
- Job Try Outs
- Open Options
- Formal Assessments such as CAPS/COPS/COPES, Career Scope, Career Cruising, Self Determination Scales, Adaptive Skills Inventories (ESTR or TPI), American College Testing (ACT) Products (Plan, Explore or Discover), Work Keys, Online Academic Student Information System 2 (OASIS) (aptitude), Checklist of Associated Work Skills, Michigan Occupational Information System (MOIS), Holland Self Directed Search (Interest Inventory), My Dream Explorer, Career Futures, etc.

Vocational Assessments and experiences require ongoing and timely communication with the student and family in order for the experiences to have meaning. When assessments are conducted and there is no follow up discussion or linkage to planning, they become meaningless. Ongoing follow up and assistance connecting what was learned through assessment activities with decision making and planning is essential. When this critical component of assessment is overlooked, students often don't remember that they went through



a vocational assessment. Educators and MRS counselors can work together in providing an ongoing discussion of information gathered through vocational assessment experiences.

In today's global economy, workers will change jobs multiple times during their career. When students learn to assess their interests and skills and see how their interests and skills interface with the job market, they are learning a lifelong skill that they will need to have a successful career.

### **What is the PERT Program at MCTI?**

The Postsecondary Education Rehabilitation and Transition (PERT) program is a one week comprehensive vocational and independent living assessment in a semi-structured residential environment at Michigan Career Technical Institute on Pine Lake in Plainwell, Michigan that serves approximately 135 Students with Disabilities (enrolled in secondary education) per year from all over the state during the summer months. The campus of MCTI offers a variety of amenities, all encompassed in one building for easy accessibility. Students reside in dormitories while participating in the program. After completion of the program, students return to their local school districts where career information that they have learned can be integrated into their IEP.

### **What should MRS counselors do when students have no idea what they want to do?**

All students are required to have an EDP which indicates a career direction and students with disabilities have a postsecondary goal statement in the IEP which drives the Transition process. The postsecondary goal includes student statements related to adult living, career/employment goals, community participation and postsecondary education or future training. Therefore, counselors can reference student postsecondary goal to see what employment goals a student has expressed.

This is an opportunity for MRS to provide vocational counseling and guidance to students and have influence upon the direction of the Transition process while the student is still in school. Through dialogue and review of the records, counselors can determine if students need more information or assessment to confirm or modify the direction they are taking. It may be appropriate for students to participate in vocational assessment, job shadowing, job try-outs or work experience to get more information before selecting an IPE job goal.

Another option is to write the IPE selecting a career pathway and amend the plan later when the individual and the counselor have more information to formulate and agree upon a job goal. Career pathways can be selected when a student is still in high school either by using Vocational Assessment/evaluation data, EDP, postsecondary goal or through vocational counseling. A student can exit high school with a career pathway job goal and still be in compliance with RSA rules about completing student IPEs prior to exit from high school.

### **Do schools have the responsibility to provide updated psychological testing to special education students?**

Schools no longer have the responsibility to provide updated testing every three years unless the IEP team concludes that the student's disability has changed. Updated testing can be requested and sometimes schools will honor the request. Schools conduct a REED Assessment to determine whether additional testing or assessments are necessary.

Counselors often play a critical role in informing special educators, parents and students about the consequences of graduating without current testing, especially when students are planning to enter postsecondary training and will need classroom accommodations to be successful. Many, if not most, colleges require psychological testing that is no more than three years old to provide classroom accommodations. In addition, updated testing is needed to be accepted

into specific postsecondary training institutions such as MCTI. In these situations, MRS can advocate for and recommend that schools conduct updated, relevant testing. If testing is not conducted by schools and is needed for rehabilitation planning, MRS may purchase the evaluation.

### **How can MRS counselors effectively guide students who want to attend college, but have low reading, writing and math levels?**

More and more students with significant cognitive challenges are attending college. College settings are a great choice for many students. At the same time, without support and significant preparation and consideration, many students enroll in college, struggle significantly and drop out.

Community colleges offer placement tests and to determine where remediation is needed in reading, writing and math. Some students must participate in remediation for years before taking college level classes. Michigan Career and Technical Institute (MCTI), adult education, Michigan Works! and many other programs are available to enhance literacy and may be better options.

While students are still in high school, early intervention and support is helpful for students who want to attend college who have low academic skills. Counselors may advise students with college aspirations to enroll in as many general education classes as possible and that the curriculum not be modified so students can experience what it will be like in college. Students can also be encouraged to use accommodations that are most likely to be permitted in college to practice and improve their learning with college-like accommodations. Counselors can inform students, families and teachers about the kinds of accommodations that colleges typically provide so that there is a clear picture about the expectations of college and the types of supports that are available. Counselors can also bring to light all the other postsecondary options available to students other than college.

The counseling process should include encouragement to build on existing strengths and also provide information about all the options that exist. Many students are drawn to college because they have heard over and over again about the importance of going to college and they feel it is something that they should do. It is best to present a range of training options and employment paths to students who have low academic abilities.

MRS policy allows for one semester of financial support for remedial classes. In addition, MRS may provide financial support for one trial semester or term to determine if the student can succeed in - training. MRS applies a means test to determine if MRS financial support can be offered. MRS does not and can't support college for college sake. College coursework must be determined to be appropriate, necessary and likely to result in employment.

Many community colleges are open enrollment and therefore anyone can enroll in classes. If students are interested in participating in college to benefit from the unique social experience that college offers, student can certainly attend college without MRS financial support by seeking family support or financial aid. In situations like this, MRS can work with the student on employment-related activities.

### **Why are more than one Vocational Assessment/Evaluation conducted for some students?**

Career preparation is a developmental process. Students are in a constant state of learning as they grow and change. Aptitudes, abilities and skills evolve as students are exposed to new ideas, information and work experiences. It is best to think of Vocational Assessment/Evaluation

as an ongoing process. More information is needed or a different type of assessment/evaluation is needed (for example, a “hands-on” evaluation rather than a paper/pencil or computerized evaluation). Students want to try-out a particular occupation and if it is determined the job is not a good match for them, more assessment may be needed. In other situations, a student may know that they want to pursue a particular career area such as health occupations, but they may need to look closer at several jobs in that broad career area to find the best match for them (for example, as x-ray technician or phlebotomist). It is the responsibility of special education and MRS to consider whether additional assessments are needed and if so, what assessments are most appropriate to meet the needs of each student.

### **How can education and MRS best work together to align the IEP and the IPE?**

The Rehabilitation Services Administration (RSA) requires MRS counselors to consider the IEP postsecondary employment goal when developing the IPE. When the two processes align, there is less confusion for students/families/guardians, it maximizes the strengths of each system, the process is seamless and student employment outcomes are improved. Therefore, working towards alignment makes sense.

Achievable job goals are selected with due consideration to determine a student's strengths, interests, resources, priorities, concerns, abilities, and capabilities. Education is required to write a measureable postsecondary goal. MRS is required to select an ONET job goal. Alignment does not necessarily mean that the job goal on the IEP and the IPE match exactly. It means that the two systems work together in a logical manner and that both systems inform, influence and strengthen the other so that students benefit. Early involvement by MRS counselors can greatly enhance efforts to achieve alignment.

Another critical element of achieving alignment is to view the selection of a job goal and needed supports and services as an ongoing process with Students with Disabilities. Flexibility is necessary and appropriate because students are developmentally changing. As students grow, new information is discovered and needs to be considered. It is not unusual for education to need to reconvene and IEP to make changes or for MRS counselors to amend IPEs for Students with Disabilities.

### **What strategies can a MRS counselor use when the student postsecondary employment goal appears unachievable?**

It is important to understand that student dreams and aspirations are never wrong. Student postsecondary goal statements are heavily influenced by their developmental level, experiences and family involvement.

All MRS customers are entitled to make an informed choice. It is the counselor's responsibility to provide an opportunity for dialogue and exchange of accurate information for students to use in the choice-making process and to facilitate informed decision making. Although MRS is not required to support unrealistic goals financially, it may be appropriate to support Vocational Assessment, job shadows, a trial work experience, etc., to help a student learn about his/her own capacities and requirements of jobs in realistic settings. Real experiences often help to bring clarity to the situation and students may opt out, refine or redirect their goal, or it may be learned that the student's determination, motivation, and/or appropriate accommodations are sufficient to overcome the obstacles.

Through vocational counseling and dialogue, a counselor can help customers understand the motivations drawing them in a particular direction. Often counselors can direct a student in discovering a related job that is within his or her abilities and capabilities. For example, if a student with a significant physical disability wants to become a firefighter, perhaps a job in a fire

station as a dispatcher, maintenance worker or clerical worker would be closer to his or her capabilities. In the end, however, counselors cannot support an IPE job goal that will not reasonably result in employment.

### **What is Motivational Interviewing and how are MRS counselors using this technique to provide vocational counseling to Students with Disabilities?**

Motivational Interviewing (MI) is an evidence-based approach to behavior change that focuses on exploring and resolving ambivalence and centers on motivational processes within the individual that facilitates change. The method differs from more coercive or externally-driven methods for motivating change. MI does not impose change that may be inconsistent with the person's own values, beliefs or wishes, rather supports change in a manner congruent with the person's own values and concerns.

MI can be used with students as a collaborative person-centered strategy to guide and strengthen motivation for change. The approach will result in a student building an internal motivation to pursue employment which is likely to achieve better results.

## **INDIVIDUAL PLAN FOR EMPLOYMENT (IPE)**

### **What should counselors do to meet the policy requirement to write IPEs when students are not ready to commit to a job goal?**

After the completion of the eligibility determination and the comprehensive assessment of rehabilitation needs, students and counselors begin to explore IPE options. MRS policy states that the IPE must be completed no more than 90 days following eligibility certification, "unless the individual and counselor require more time to arrive at an agreed upon plan." Counselors have the option of delaying the plan until more information is gathered, documenting the reason for the delay and the activities or services planned to complete the IPE. Once a student is eligible for MRS the IPE must be completed prior to the student's exit from secondary education. The student and counselor have the option to write a plan using a career pathway and amend the plan when more information is gathered to select a specific vocational goal.

A student can exit high school with a career pathway, however training and placement services cannot be provided until the IPE is amended to reflect a specific job goal.

### **What should counselors do when referrals are received late in the final semester of high school and there is not enough time to determine eligibility and formulate an IPE?**

This requirement is applicable only for students who are found eligible for MRS services prior to exit from secondary education.

Sometimes students are referred to MRS so close to exit that there is not sufficient time for the counselor to make an eligibility determination. In these instances when the student is still an applicant for MRS services, the counselor is not required to complete an IPE before the student leaves school. Once eligibility has been determined, the student and counselor have 90 days to develop the IPE unless there is a necessary agreed upon delay.

The best strategy to avoid late referrals is to work with your referral sources proactively so last minute referrals are kept to a minimum.

### **Can a customer receive MRS assistance in postsecondary education and at the same time, receive MRS assistance to obtain and maintain employment?**

If student has an IPE directed towards college training, part of that IPE may also include basic supports to obtain a job during the educational process. Services that may be provided include guiding the individual through the job seeking process, referral for assistance through Michigan Works! or similar benefits, assistance preparing for an interview, and filling out applications.

Students can benefit from a continuum of exposure to work while attending postsecondary education including but not limited to:

- Job Shadows,
- Employer Interviews,
- Volunteer Work,
- Part Time Work Experience,
- Summer Employment, and
- Internships.

MRS policy does not force students to choose between MRS assistance for postsecondary education and MRS assistance for job placement. The IPE can indicate that an entry-level job is a stepping stone to achieve the IPE job goal. In this situation it is critical that the counselor document clearly the rationale.

### **Do parents and legal guardians have to sign the IPE?**

When a student is a minor, not only do parents/ guardians have to sign the application for MRS services and releases of information, they also have to sign the IPE. There are times when obtaining parent/ guardian signatures can be a challenge. Placing a phone call to parents/guardians explaining the purpose and need for their signature and sending paperwork home in the mail is sometimes better than leaving it up to students to explain to their parents and hand carry paperwork home. Providing a preaddressed envelope with postage is another strategy to ensure that paperwork is returned to MRS.

When students turn 18 or when they become their own legal guardian it is often a big adjustment for parents and guardians. When students are 18 or older and their own guardian, MRS counselors are required to get signed releases from students (who are now young adults) in order to share information with parents.

### **Can students exit high school with a career pathway job goal?**

Yes they can. Often students need time to identify a specific job goal and sometimes a job goal has not been selected as the student nears exit from high school. In this situation a MRS counselor can work with the student to select a Career Pathway and complete the IPE using the selected pathway. After the individual exits high school, the counselor and the customer must amend the IPE as soon as possible to reflect a more specific employment goal. Under a Career Pathway job goal, MRS cannot provide many services such as vocational training or job placement. In addition, a Career Pathway cannot be used as the job outcome for a successful employment closure.

### **Are students that participate in unpaid work experiences required to have work permits?**

If a minor student is working in conjunction with a school district and is covered under a school contract such as Occupation Training Agreement (OTA) with a Training Plan, the OTA doubles as the work permit (per the State guidelines) and therefore work permits would **not** be required.

If a student is not covered under a school contract such as an OTA then the student does require a work permit. This is true for community work experiences that are assessment oriented, short term, unpaid or paid.

For more information see the Work Permit Fact Sheet at:

[www.michigan.gov/documents/Work\\_Permit\\_FACT\\_SHEET\\_July\\_2006\\_169123\\_7.pdf](http://www.michigan.gov/documents/Work_Permit_FACT_SHEET_July_2006_169123_7.pdf)

and the Work-Based Learning Risk Management Guide at:

[www.michigan.gov/mde/0,1607,7-140-6530\\_2629\\_8423-17155--,00.html](http://www.michigan.gov/mde/0,1607,7-140-6530_2629_8423-17155--,00.html)

## **COORDINATION AND PROVISION OF SERVICES**

### **Can MRS fund college training for students who are dual enrolled and are still in high school?**

When the purpose of college coursework is to earn credit toward a high school diploma, the responsibility falls on the school district or the parent. MRS may be able to fund college classes when a high school student is taking classes that are necessary to achieve an IPE job goal. Another possible scenario is one where MRS agrees to pay for one semester or class as an evaluation of a student's ability to benefit from college. Other than a trial semester, MRS generally does not contribute when only one college class is involved.

### **When is it appropriate for MRS to purchase assistive technology for students?**

If the equipment is not required for the student to participate in educational activities, but will be necessary to accomplish an employment goal that is specified in the IPE, then it is reasonable for MRS to purchase the equipment. For example, the school has an assistive listening system for use in the classroom. It does not belong to the student and is used only in the classroom. The hard of hearing student is adequately accommodated while in school. However, to participate in a paid work experience, the student will need assistive listening equipment to communicate with the employer and co-workers. If the employment setting is compatible with the IPE goal and is likely to lead to an employment outcome, it is appropriate for MRS to purchase the equipment prior to the student's exit from high school.

MRS may purchase assistive technology for students who are in postsecondary training when it is not the responsibility of the postsecondary institution. Assistive technology for these students is determined by the student's disability and the availability of assistive technology at the school they are planning to attend.

Counselors often rely on assistive technology assessments to determine what disability-related assistive technology is necessary. Students in postsecondary training often contribute to the cost of assistive technology.

### **Can MRS provide work-based learning experiences for students in the K-12 System?**

Yes. Work-based learning experiences include a continuum of paid and unpaid opportunities such as:

- Career exploration activities,
- Job tryouts,
- Career preparation
- On-the-job training,
- Service learning, and
- Internship

Under IDEA and WIOA, either partner (education or MRS) may provide work-based learning opportunities for students. Education and MRS can also team up on behalf of a student and provide coordinated opportunities where each partner steps up to provide part of the service.

### **How does MRS collaborate with education to provide work-based learning experiences for students?**

Work-based learning experiences are an evidence-based practice (Test et al, 2009) and are part of Pre-Employment Transition Services under WIOA. Students that participate in these experiences are more likely to attend postsecondary education and/or become employed after high school.

The IEP team (education, student, parent and when appropriate agency representative) will often identify work-based learning experiences as a needed Transition service. When this occurs, education has the responsibility to implement the Transition program, including coordination of services with agencies involved in supporting the transition of students to postsecondary activities. This means that with cooperation from other agencies, education can identify in the IEP that another agency will be providing or enhancing work-based learning opportunities for students.

Because both education and MRS can coordinate, provide and collaborate to create work-based learning opportunities, it is an area that requires communication and planning at the local level. ICTAs can identify work-based learning as an area to prioritize services. In some cases, ICTAs can be increased to make additional funding available for these programs.

When MRS engages with students to provide work-based learning opportunities, the vocational rehabilitation process still applies. Work-based learning services are like any other MRS service in that the student must be eligible for MRS; necessary for that student to achieve an employment outcome; and delineated in the student's IPE. For example, in situations where MRS and educational partners have developed a summer work program for students, each student needs to be assessed and provided individually determined and necessary supports and services.

Work-based learning experiences can also be individually developed for each student. They do not have to part of a program serving a group of students.

### **What is MRS' responsibility regarding providing driver training?**

MRS has no general obligation to provide driver training to students with disabilities. MRS may provide driver training when it has been determined to be an essential service for an individual to become successfully employed. In these cases, driver training is considered a support service to facilitate students' abilities to participate in a required IPE service or in employment. Before driver training is considered, MRS requires that comparable benefits are explored and used when available, and that alternate, more cost effective means of transportation to achieve a desired IPE outcome are exhausted. Provision of a vehicle for driver's training is the family's responsibility.

### **What types of services can the MRS Business Network Unit provide to Students with Disabilities?**

The BNU can provide the following services:

- Clinical intake;
- Vocational testing;
- Transferable Skills Analysis (TSA);

- Labor Market Survey (LMS);
- Occupational Services:
  - Assistive technology evaluations for accessibility, and
  - Assistance with identifying reasonable accommodations in the workplace and/or in the work experience/internship site/training program;
- Plan development which may include one or more of the following:
  - Identification of training programs (college, vocational education, etc.),
  - On-the-job training development,
  - On-the-job evaluation development,
  - Internship development,
  - Informational interviews with employers,
  - Job preparation (resume, interviewing, etc.), and
  - Job placement.

### **When can MRS fund job coaching to students who are still in high school?**

Job coaching may be funded by MRS if the student requires job coaching to participate in PETS or has an IPE that identifies job coaching as a needed service.

### **Can MRS fund job coaching for students in summer jobs?**

Yes. MRS counselors can provide short-term job coaching to support summer employment on a case by case basis. The employment should be considered an essential step in the student's progression toward their future career and job coaching should be delineated in the IPE.

## **POSTSECONDARY TRAINING AND FINANCIAL AID**

### **How does MRS help students access and prepare for postsecondary education?**

Postsecondary education is often a critical step to prepare for and obtain gainful employment. However, traditional college or university training is not always the best course of action for all students. Fortunately there are many options.

MRS counselors help students and families consider the full range of postsecondary possibilities including postsecondary education, training and vocational experiences to determine which postsecondary option can best meet individual student needs. Many students exit high school with limited or no work experience. In situations like this it sometimes is best for students to work for a period of time to gain valuable work experience while they sort out what they want to do. Some students learn best in postsecondary environments that are more hands-on in nature such as auto mechanic, cosmetology or custodial training.

Many students are better served obtaining a certificate and working their way up while they grow and learn on the job. For example, a student might want to become a Registered Nurse (RN) but they are not prepared for the academic rigor to be successful in an RN training program. When this is the case it makes sense to start out with Nurse's Aide training, gain work experience, work on improving academic skills and then work toward the goal of becoming a registered nurse.

Regardless of which postsecondary option a student is considering, they must be determined by MRS to be able to benefit from that specific postsecondary environment. MRS makes this determination by looking at all the student's available documentation in the context of their



vocational goal and the postsecondary institution. If necessary, MRS can purchase additional assessments to help make this determination.

When students with disabilities are in high school, they are covered by the IDEA. When they graduate or exit the high school, the IDEA coverage ends. The young person is then covered by a different law – The Americans with Disabilities Act (ADA) which is a federal civil rights law that prohibits discrimination against persons with disabilities. There are big differences between the IDEA and ADA that have implications for the supports and services students are able to receive in postsecondary training and employment. For example, in high school, students who receive special education services may receive course adaptations and modifications. In postsecondary settings, adaptations and modifications are not allowed; reasonable accommodations are provided. In other words, students are expected to perform all the essential requirements of a class but they can accomplish tasks in a different way. A high school student may be allowed to receive prompts during a test or a restating of questions where as in the postsecondary setting that same student may be allowed a reader. MRS counselors help students and families understand the differences and provide support, guidance and sometimes advocacy as students Transition from one setting to another.

Another challenge for students and families is sorting out the financial aid process to determine how to pay for postsecondary training. MRS counselors have worked with many students to secure financial aid and can provide advice and guidance. MRS uses a needs assessment to determine if financial assistance from MRS can be provided.

MRS is actively involved in determining the appropriateness of postsecondary education, providing vocational counseling to determine postsecondary vocational goals and guiding students through the planning and financial aid process if appropriate. MRS also can assist in coaching and preparing students and families for the differences between high school and postsecondary institutions. If the student will need support services while in college or other postsecondary training, it is the role of education and MRS to work with students and families to ensure coordinated services take place and that the appropriate documentation is made available for students to take to postsecondary institutions to secure the accommodations they will need to be successful.

### **Can students who exit high school with a Local Certificate of Completion/Attendance receive Financial Aid for college?**

Possibly. According to FAFSA, to receive federal student aid, you must meet the following requirements:

- Demonstrate financial need (for most programs);
- Be a U.S. citizen or an eligible noncitizen;
- Have a valid Social Security number (with the exception of students from the Republic of the Marshall Islands, Federated States of Micronesia, or the Republic of Palau);
- Be registered with Selective Service, if you're a male (you must register between the ages of 18 and 25);
- Be enrolled or accepted for enrollment as a regular student in an eligible degree or certificate program;
- Be enrolled at least half-time to be eligible for Direct Loan Program funds;
- Maintain satisfactory academic progress in college or career school;
- Sign the certification statement on the Free Application for Federal Student Aid (FAFSA®) stating that you are not in default on a federal student loan and do not owe money on a federal student grant and
- You will use federal student aid only for educational purposes; and

- Show you're qualified to obtain a college or career school education by having a high school diploma or a recognized equivalent such as a General Educational Development (GED) certificate;
- Completing a high school education in a homeschool setting approved under state law (or—if state law does not require a homeschooled student to obtain a completion credential—completing a high school education in a homeschool setting that qualifies as an exemption from compulsory attendance requirements under state law); or
- Enrolling in an eligible career pathway program and meeting one of the "ability-to-benefit" alternatives described below:
  - ✓ If you were enrolled in college or career school prior to July 1, 2012, or if you are currently enrolled in an eligible career pathway program\*, you may show you're qualified to obtain a higher education by
    - ❖ passing an approved ability-to-benefit test\* (if you don't have a diploma or GED, a college can administer a test to determine whether you can benefit from the education offered at that school) or
    - ❖ Completing six credit hours or equivalent course work toward a degree or certificate (you may not receive aid while earning the six credit hours).

### **What is Michigan Career and Technical Institute (MCTI) and how is it connected to MRS?**

The MCTI is a Vocational Training Center administered by MRS. The mission of MCTI is to conduct vocational and technical training programs and to provide supportive services needed to prepare Michigan citizens with disabilities for competitive employment. MCTI serves a subset of MRS customers who need intensive supports to succeed in postsecondary education.

MCTI is located in Plainwell on the edge of Pine Lake in rural western Michigan, about 20 miles from Kalamazoo and is a residential facility. The following training programs are available at MCTI:

- Automotive Technology,
- Cabinetmaking/Millwork,
- Career Assessment Services,
- Career Readiness Center-Literacy and Math Remediation
- Certified Nurse Assistant,
- Culinary Arts,
- Custodial,
- Electronics,
- Graphic Communications (Printing),
- Grounds Maintenance and Landscaping,
- Machine Technology,
- Office Automation,
- Retail Marketing,
- Pharmacy Technician,
- Weatherization.

MCTI also offers a wide array of residential supports, including intensive assessment and remedial reading, mathematics and applied knowledge programs to raise the functional level of students entering the trades programs, as well as concentrated residential supports delivered by a multidisciplinary team to improve employability skills, disability management and independent living skills. Although some students enter the trades training directly after career assessment, most incoming students have cognitive and mental or emotional disabilities that interfere with

their ability to live independently and sustain work. The supportive services have evolved to meet the changing needs of VR customers who attend MCTI.

MCTI is one vocational training option that works well for many students. At the same time that MCTI is a wonderful opportunity for many, it is not the best opportunity for all students. For this reason, teachers should involve MRS counselors early on if a student is seriously considering MCTI. Information about MCTI can be found at:

[www.michigan.gov/mdcd/0,1607,7-122-25392\\_40237\\_40242---,00.html](http://www.michigan.gov/mdcd/0,1607,7-122-25392_40237_40242---,00.html)

### **Which students are good candidates for MCTI?**

MCTI is one of many postsecondary training options and is not appropriate for everyone. Students must be at least 18 years old to attend. They need to have interests, aptitudes, abilities and meet the trade requirements in at least one of the trade areas. Although MCTI is a supportive setting, students need to be able to function independently especially in the residential community at MCTI. As with all postsecondary institutions, assessment and planning is essential to ensure a student's success at MCTI.

### **What should counselors do when the documentation that a school is providing does not meet the requirements set by MCTI?**

MCTI often requires updated psychological reports to support student enrollment into trade programs. Updated psychological reports are not required under the IDEA if the IEP team has determined that a student's disability is unchanged from the previous report. Therefore the most recent psychological report on a student is often several years old creating a dilemma for MRS counselors. In this situation a counselor has several options:

- Advocate for the school to provide updated psychological testing to support the student's postsecondary goal,
- Request the school provide targeted updated testing such as a reading or math test (or whatever testing MCTI needs to make an enrollment decision),
- Utilize other school documents to determine student disability and functional abilities or
- Coordinate updated testing through a private vendor which can occur while a student is still in high school.

### **Do all MRS customers who are attending postsecondary education have to apply for financial aid?**

If a student is asking MRS to assist with college costs, the student must apply for financial aid each academic year they plan to attend college. This is mandated by state administrative rules. Under these rules, MRS applies a means test that is administered in collaboration with postsecondary institutions. In order to receive MRS funds for college costs, students must have an unmet financial need. MRS policy limits the amount of funding a student can receive each semester which is intended to allow the agency to assist as many people as possible with limited funds, while using other funding sources that are available.

### **Can students attend postsecondary institutions that do not accept FAFSA?**

Yes. MRS is required to support postsecondary institutions that meet the needs of the student at the least cost to MRS. The counselor and the customer should research all options available to achieve the job goal in the IPE.

If the school that is selected does not accept FASFA there may have an equivalent option. For example, a private school may have internal grants and scholarships available. In these situations, MRS will use the economic needs test that is required by the postsecondary institution.

### **How are students who plan to attend postsecondary education impacted when they exit high school with Local Certificates of Completion/Attendance?**

Many postsecondary institutions require high school diplomas as admission criteria. In these schools, students with Local Certificates of Completion/Attendance will not be accepted. In situations where a postsecondary school has an open enrollment policy, students with Local Certificates of Completion/Attendance are able to apply. However many schools require basic skills testing that limits the classes that a student can enroll in until the student can achieve specific academic levels.

### **How can counselors negotiate situations where teachers, students, and parents have predetermined that a student will be attending postsecondary training and where they will be going before MRS has gotten involved?**

In situations like this, MRS counselors need to work with school personnel and caution them that MRS must agree that postsecondary training is required and appropriate and that the training will likely result in an employment outcome. In many cases, Transition planning occurs before MRS counselors get involved and therefore teachers and students sometimes are ahead of MRS in the process. Problems arise when plans that are being made cannot be supported by MRS. Involving MRS early in the planning process is the best strategy to limit or prevent situations like these from occurring.

### **What documentation do postsecondary institutions require in order to provide accommodations?**

Postsecondary institutions have discretion regarding what documents they will accept to allow students to receive accommodations at the college level, therefore there is variation in what students need from one college to the next. Michigan-Association of Higher Education Association and Disabilities (MI-AHEAD) recommends that documentation be no more than 3 years old and signed by a licensed psychologist or physician. This is a good rule to follow and will meet the minimum requirement at most colleges.

### **Why don't colleges automatically accept accommodations written into IEPs?**

When students leave the school setting they are no longer protected by the IDEA, therefore postsecondary institutions do not automatically accept recommendations for accommodations that are written in IEPs. College students are protected by the Americans with Disabilities Act (ADA), which allows for "reasonable accommodations." The ADA is the same law that protects people with disabilities in the workplace. Typical college accommodations include extended time for tests, readers, scribes, use of a tape recorder, real-time captioning, special seating, etc. Several accommodations that secondary schools typically provide such as modifying curriculum or limiting assignments are not considered reasonable accommodations at the postsecondary level.

## **EMPLOYMENT**

### **How does MRS help students obtain employment?**

Part of the MRS Comprehensive Assessment of Rehabilitation Needs is determining what types of supports a student will need to obtain employment. MRS has a range of services that can be

coordinated, purchased or provided depending upon the needs of the student. Some students may need assistance with their resume and job leads. Others need the guidance of a specially trained job development/placement professional to secure employment. Often job developers will act on behalf of the student to talk to employers about the needs of the business and the strengths of the student.

### **How are employers treating the Local Certificate of Attendance/Completion as a High School Diploma when hiring employees?**

This varies from one employer to another. Depending upon the job duties for specific jobs, some employers are making exceptions or changing their job descriptions to accept a High School Diploma, GED or Local Certificate of Attendance/Completion. It should be noted however that in reality, the Local Certificate of Attendance/Completion is **not** equivalent to a High School Diploma or GED.

### **When an individual possesses a Local Certificate of Attendance/Completion, should they indicate on job applications that they have a high school diploma/GED?**

No. Doing so is a misrepresentation and could result in termination of employment. It is better to write on the application, "Will discuss at interview". If the application is electronic, and a box must be checked, the applicant should respond honestly.

### **How should MRS approach employers about hiring a student with a local certificate of completion/attendance?**

The role of counselors and job developers is to work with employers to open doors for job seekers. The most important thing is to focus on what the student can offer to an employer rather than the fact that they don't have a high school diploma or GED. A portfolio highlighting student strengths, abilities and job skills including information about the courses that the student passed in school is a good strategy.

Another strategy is to talk with an employer about an On-the-Job Evaluation or On-the-Job Training opportunity for the customer where they can demonstrate their skills to the employer.

Many employers require a diploma/GED without giving it much thought. The onus is on the employer to prove why the diploma/GED is necessary for the essential functions of the job. If the employer is unable to do so, then the requirement can be legally challenged.

### **Can MRS close a student rehabilitated prior to their exit from secondary education?**

Yes but it would be somewhat unusual. If the job that a student has achieved is stable and it meets all MRS criteria for case closure, a counselor can close a student as rehabilitated even if the student is still in secondary education.

### **What is Supported Employment?**

Supported Employment is paid competitive work in integrated settings for people with the most significant disabilities for whom competitive employment has not traditionally occurred; employment has been interrupted or intermittent; and ongoing supports are required to maintain employment.

Integrated employment can be full or part-time in integrated settings where individuals get paid at or above minimum wage, but not less than the customary wage and level of benefits paid by the employer for the same or similar work performed by individuals who are not disabled.

Integrated settings are typically found in the community at which individuals with the most significant disabilities interact with non-disabled individuals, other than non-disabled individuals who are providing services to that individual, to the same extent that non-disabled individuals in comparable positions interact with other persons. Sheltered workshops do not constitute integrated settings.

The key characteristic of supported employment is that the customer needs and receives long term follow-along to maintain their job. Supported Employment programs are typically provided collaboratively via partnerships between the Michigan Department of Community Health (MDCH), Community Rehabilitation Organizations (CROs) and MRS.

### **What is MRS' role in Supported Employment?**

Supported employment is typically provided collaboratively by MDCH and MRS plays a big role in the coordination, and provision of services. To receive supported employment customers are usually dually eligible for both programs. MRS and MDCH determine eligibility for their respective programs. When supported employment services are required, they become part of the IPE and extended follow-along supports are identified.

MRS has many longstanding ICTAs with local MDCHs. Funds from these agreements are used to provide supported employment services to joint customers with the most significant disabilities that require supported employment.

Teachers, parents and students need to understand the importance of applying for MDCH services in the student's last year of high school (or earlier if needed), and what information will be needed by MDCH to determine eligibility. When students are eligible for MRS and MDCH services, they are in the best position to access supported employment services. Laying the groundwork for this while a student is still in high school ensures a seamless Transition to necessary supports.

### **Can MRS count community services such as AmeriCorps, Vista or the Peace Corps as a successful employment outcome?**

Yes, but there are some stipulations. Community service experiences provide differing stipends and benefits. Some pay minimum wage in addition to child care living and housing allowance. All pay a college scholarship if the individual completes a minimum of a 12 month service experience. The wages and the value of all of the benefits (including the college scholarship) can be factored in when determining the hourly wage of the individual. MRS can consider AmeriCorps placements as employment outcome and possibly a rehabilitation closure when the placement is at least 6 months in length, the customer agrees that the outcome is satisfactory and other closure criteria in MRS policy are met, including consistency with the job goal.

### **If a student is eligible for SSI benefits, how are those benefits impacted by working?**

For SSI, Social Security uses a formula which starts by ignoring the first \$85 of the income earned in a month. If non-wage income is received, the first step of the formula ignores up to the first \$20 or this amount. The remainder (\$65) is then applied toward the individual's gross earnings. The formula continues by ignoring ½ of the remaining gross monthly pay. For example, if a child on SSI works and receives \$285 gross pay in a month, then the formula is  $\$285 - \$85 = \$200$ ;  $\$200$  divided in half = \$100. The child's SSI payment must be reduced by \$100 because of monthly gross pay from working of \$285.

Michigan offers a free on-line calculator to help individuals determine how working will impact upon their benefits. The website is available at:

<http://www.mi.db101.org/planning/>.

### **What is the Student Earned Income Exclusion that is offered by Social Security?**

If the child receiving SSI is under age 22 and a student\*, then there is a special provision called the Student Earned Income Exclusion which, as of 2011, allows Social Security to ignore up to \$1640/month, with a yearly maximum of \$6,600, of gross pay from working. This is an especially generous provision that applies to many transitioning youth. In most cases it allows them to work with no effect at all on their monthly SSI disability payments.

To qualify, students must be “regularly attending school, which means they must take one or more courses and attend classes as follows:

- In a college or university, for at least 8 hours/week; or
- In grades 7-12, for at least 12 hours/week; or
- In a training course to prepare for employment, for at least 12 hours/week; or
- For less time than indicated above for reasons beyond the student’s control (such as illness); or
- This provision can even include home study.

### **What can MRS counselors do when parents/guardians discourage their student from working because they don’t want to lose the student’s Social Security benefits?**

Transition customers and their parents/guardians often fear the loss or reduction of Social Security benefits when students go to work. It is critical for students and parents/guardians to have the right information at the right time about the ways in which social security supports individuals who receive benefits and want to pursue employment. Lack of accurate information creates fears which can produce significant barriers to providing job training and employment opportunities for students who receive benefits.

While employment can sometimes result in benefit reductions or suspensions, for the most part Social Security’s rules about working are surprisingly liberal, allowing students who receive benefits to engage in working with little or no effect on their benefits. Social Security encourages students who receive benefits to try to work if they are able to, and it offers a variety of provisions that are designed to increase self-sufficiency.

## **DESCRIPTION OF SCHOOL DOCUMENTS**

<b>School Document Name</b>	<b>Document Description</b>	<b>Information Available to Determine Disability?</b>	<b>Identifies Career Direction?</b>	<b>Identifies Functional Abilities?</b>
<b>Education Development Plan (EDP)</b>	An Education Development Plan (EDP) documents the ongoing process in which students identify career goals and a plan of action to achieve them. All students have an EDP including students with disabilities. Students develop their first EDP in middle school, identifying an initial career goal and educational experiences. The purpose of the EDP is to provide every student with a guide or map to take	No	Yes	No

	<p>effective steps to reach their career goals. For example if a student plans to be a nurse, they should be taking biology, chemistry and advanced math to help them prepare for their future coursework in postsecondary training. Students, parents and/or guardians and school counselors use the EDP to direct the course of study that the student is taking based on career exploration, career assessment information, school performance, and expressed interests. The EDP is coordinated with the IEP and is the foundation that the IPE is built upon.</p>			
<b>Individualized Education Program (IEP)</b>	<p>Each public school child who receives special education and related services must have an Individualized Education Program (IEP). An individualized education program means one that is designed to meet the unique educational needs of one child, as defined by federal regulations helps kids reach their goals. The IEP must be tailored to the individual student's needs as identified by the evaluation process and must help teachers and related service providers understand the student's disability and how the disability affects the learning process. In other words, the IEP should describe how the student learns, how the student best demonstrates that learning and what teachers and service providers will do to help the student learn more effectively.</p>	Yes	Yes	Yes
<b>Present Level of Academic Achievement and Functional Performance (PLAAPF)</b>	<p>The purpose of this statement in the IEP is to provide an overview of factors that impact the student's performance and subsequent development of programs and services to meet the student's unique learning needs. The PLAAPF provides a foundation for developing rigorous supports to create an opportunity for greater student success. It is the basis from which all other Individualized Education Program (IEP) components are developed. Each area of need identified in the present level must be addressed in another appropriate section of the IEP form.</p>	Possibly	Possibly	Yes
<b>Transition Assessments</b>	<p>An ongoing process of collecting data on individual student needs, preferences, and interests as they relate to the demands of current and future working, education, living, and personal and social environments. Assessment data serve as the common thread in the Transition process and form the basis for defining goals and services to be included in the IEP.</p>	No	Yes	Yes
<b>School Psychological Report</b>	<p>A report written by a certified school psychologist or licensed psychologist in the school setting that provides an analysis and other evaluation data</p>	Yes	Possibly	Yes



	<p>about a student's academic and behavioral functioning. The primary purpose of the report is to help school personnel and parents understand the relationship between the problem for which the student was referred, the cause(s) of that problem, and why the student is not progressing in the general education curriculum. The problem analysis and evaluation data form the basis for the development of appropriate interventions and is applicable to all psychological reports whether generated to address exceptional education questions, Section 504 accommodations, counseling and consultation services, or any of a variety of educational service concerns. School psychological testing is no longer required under the IDEA every three years unless it is determined that there has been a change in a student's disability and updated testing is needed to for appropriate educational planning for the student. In situations where the student's disability has remained the same, the REED is used to determine continued eligibility for special education services.</p>			
<b>Review of Existing Evaluation Data (REED)</b>	<p>A process that documents that student data has been reviewed by a team of qualified school staff for the purpose of preparing to evaluate a student for special education eligibility or for redeterminations of eligibility for special education.</p>	Yes	No	Yes
<b>Vocational Assessment/Evaluation</b>	<p>Vocational Assessments help students determine their career direction by assessing student interests, aptitudes, abilities and job skills. There are many different vocational assessment tools used by schools and they may be formal or informal. Often combinations of assessment tools are provided to students during their educational experience.</p>	Possibly	Yes	Yes
<b>Summary of Performance (SOP)</b>	<p><i>For a child whose eligibility for school is ending due to graduation or age, a LEA shall provide the child with a summary of the child's academic achievement and functional performance (IDEA 04). The SOP is a separate document from the IEP to be used by the student. It can be utilized as a good source of information concerning the student's abilities and needs. The SOP may be helpful in determining student supports and therefore, what vocational rehabilitation services are needed for successful employment. The SOP may include:</i></p> <ul style="list-style-type: none"> <li>• Background information,</li> <li>• Postsecondary goals,</li> <li>• Academic and functional levels of performance,</li> <li>• Recommendations to assist the student in meeting his/her postsecondary goals,</li> <li>• The student's input.</li> </ul>	Possibly	Possibly	Yes

	This information could be made available to MRS by the student.			
<b>Social Work, Occupational Therapy, Physical Therapy, Audiology, Vision, ASD Consultant, Mobility, Assistive Technology, Speech and Language, etc. Reports</b>	There are many school reports that are generated by school specialists that provide a variety of information about students. These reports address the related services that students may need to fully participate in and benefit from their educational program.	Possibly	Possibly	Possibly
<b>Medical Reports Submitted to Schools</b>	Often forms are sent by schools to a student's physician to verify that a student is being treated for a specific condition. Schools then may use this information as part of the evaluation process to determine whether or not a student has a disability. With parent (or student if over 18) consent this information could be made available to MRS. Common medical reports that are often made available to MRS counselors by schools may contain information about the student's disability.	Yes	No	Possibly

## ACRONYMS

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ACT	American College Testing
ADA	Americans with Disabilities Act
ADD	Attention Deficit Disorder
ADHD	Attention Deficit Hyperactivity Disorder
ASD	Autism Spectrum Disorder
BSBP	Bureau of Services for Blind Persons
BNU	Business Network Unit
CARN	Comprehensive Assessment of Rehabilitation Needs
CBI	Community Based Instruction
CRC	Community Rehabilitation Center
CRO	Community Rehabilitation Organization
EDP	Education Development Plan
EOR	Employer of Record
ESTR	Enderle-Severson Transition Rating Scale
FAPE	Free Appropriate Public Education
GED	Graduation Equivalency Diploma
ICTA	Interagency Cash Transfer Agreement
IDEA	Individuals with Disabilities Education Act
IEP	Individualized Education Program
IPE	Individual Plan for Employment
ISD	Intermediate School District
LMS	Labor Market Survey

LEA	Local Education Agency
MARSE	Michigan Administrative Rules for Special Education
MCTI	Michigan Career and Technical Institute
MDCH	Michigan Department of Community Health
MDE/OSE	Michigan Department of Education/Office of Special Education
MI-AHEAD	Michigan-Association of Higher Education and Disabilities
MI-TOP	Michigan Transition Outcomes Project
MMC	Michigan Merit Curriculum
MOIS	Michigan Occupational Information System
MTP	Michigan Transition Projects
MWA	Michigan Works! Agency
MRS	Michigan Rehabilitation Services
OJE	On-the-Job Evaluation
OJT	On-the-Job Training
OASIS	Online Academic Student Information System
OTA	Occupation Training Agreement
OSS	Order of Selection
REED	Review of Existing Evaluation Data
RSA	Rehabilitation Services Administration
RTI	Response to Intervention
PC	Personal Curriculum
PLAAFP	Present Level of Academic Achievement and Functional Performance
SLD	Specific Learning Disability
SSDI	Social Security Disability Income
SSI	Social Security Income
SOP	Summary of Performance
TPCA	Third Party Cooperative Arrangement
TSA	Transferable Skills Analysis
WIOA	Workforce Innovation Opportunity Act

## LINKS

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[www.resa.net/specialeducation/transitionplanning/studentexit/](http://www.resa.net/specialeducation/transitionplanning/studentexit/)

Quick Guide to High School Completion for Students with Disabilities.

[www.michigan.gov/mde](http://www.michigan.gov/mde)

Michigan Department of Education

[www.michigancap.org/](http://www.michigancap.org/)

Michigan College Access Portal

[www.mi-top.cenmi.org/](http://www.mi-top.cenmi.org/)

Michigan Transition Outcomes Project

[www.michigantsa.com/](http://www.michigantsa.com/)

Michigan Transition Services Association

[www.ncwd-youth.info/](http://www.ncwd-youth.info/)

National Collaborative on Workforce and Disability dedicated to ensuring that transition age youth are provided full access to high quality services in integrated settings to gain education, employment and independent living.

[www.nsttac.org/](http://www.nsttac.org/)

National Secondary Transition Technical Assistance Center

[www.cincinnatichildrens.org/svc/alpha/p/search/](http://www.cincinnatichildrens.org/svc/alpha/p/search/)

Project SEARCH

[www.seac.cenmi.org/](http://www.seac.cenmi.org/)

Special Education Advisory Council

[www.dartmouth.edu/~ips/](http://www.dartmouth.edu/~ips/)

Supported Employment Center

[www.thinkbeyondthelabel.com/](http://www.thinkbeyondthelabel.com/)

Think Beyond the Label

[www.dcdt.org/transitionresources.cfm](http://www.dcdt.org/transitionresources.cfm)

Division on Career Development and Transition

[www.autism.sedl.org/](http://www.autism.sedl.org/)

Vocational Rehabilitation Service Models for Individuals with Autism Spectrum Disorders

[www.communityinclusion.org/](http://www.communityinclusion.org/)

Institute for Community Inclusion

[www.cast.org/index.html](http://www.cast.org/index.html)

Center for Applied Special Technology

[www.michigan.gov/careers](http://www.michigan.gov/careers)

This site is a bridge to state and national employment, career, education, training, and business resources and services.

[www.mois.org](http://www.mois.org)

MOIS, a comprehensive career development program that helps K-12 students and other users plan a career path that matches interests with future job markets.

[www.going-to-college.org](http://www.going-to-college.org)

Resource for teens with disabilities that are planning to or are attending college.

[www.michigancc.net](http://www.michigancc.net)

Resource information about Michigan community colleges and a directory of all Michigan postsecondary institutions.

[www.petersons.com](http://www.petersons.com)

Provides a wide range of educational information and support.

[www.michigan.gov/mrs](http://www.michigan.gov/mrs)

State bureau site for job seekers with disabilities.

[www.michigan.gov/mdcd/0,1607,7-122-1680\\_2735---,00.html](http://www.michigan.gov/mdcd/0,1607,7-122-1680_2735---,00.html)

Provides policy interpretation and guidance, grant administration and oversight, audit resolution, and technical assistance to Michigan universities, community colleges, independent colleges, proprietary schools and licensed establishments.

[www.health.gwu.edu](http://www.health.gwu.edu)

Resource information about scholarships available for individuals with a variety of disabilities.

[www.mi-car.org](http://www.mi-car.org)

MI-CAR has a variety of ways to help explore career options and is a great tool to guide individuals through Assessment, Career Pathways, Resources, etc.

[www.michigan.gov/disabilityresources](http://www.michigan.gov/disabilityresources)

Devoted specially to the interests, concerns, and needs of Michigianians with disabilities.

[www.copower.org/](http://www.copower.org/)

Source of information about issues of importance in Michigan's Disability Community.

[www.ilr.cornell.edu/edi/pcp/index.html](http://www.ilr.cornell.edu/edi/pcp/index.html)

An overview of the person centered planning process

[www.collegedegree.com/states/michigan-colleges](http://www.collegedegree.com/states/michigan-colleges)

Michigan accredited colleges and universities