



## **Youth Transition Services - Frequently Asked Questions**

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## INTRODUCTION

The purpose of this document is to provide guidance to the most frequently asked questions from MRS counselors and special educators regarding transition and emphasizes how MRS and education work together.

Originally developed in 2002 in response to questions submitted by counselors from Michigan Rehabilitation Services (MRS) it has been revised in 2008, adding some new questions from counselors as well as questions from the Michigan Department of Education, Office of Special Education and Early Intervention Services (MDE-OSE/EIS).

Although the primary target audience is MRS counselors and special educators, this document may provide explanation and guidance to other professional partners as well.

### **What is meant by transition services?**

Transition services are services that 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. MRS and the MDE-OSE/EIS have a joint mandate to provide transition services. The definition of transition services used by MRS under the Rehabilitation Act is very similar to the definition used by the Department of Education; however, there are some minor differences since the reauthorization of IDEA in 2004. The definition in the Rehabilitation Act, and used by MRS, includes language that is specific to vocational rehabilitation that is not referenced in the definition used by education.

According to the Rehabilitation Act:

“Transition services are defined as a coordinated set of activities for a student 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 accomplishment of long-term rehabilitation goals and intermediate rehabilitation objectives identified in the student's IPE.” (Michigan Rehabilitation Services Glossary)

According to IDEA as amended in 2004:

“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.”

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

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

The Individuals with Disabilities Education Act (IDEA) is federal legislation that mandates a free appropriate education for children with disabilities. This law requires that planning and activities occur to prepare individual student for adult life. IDEA mandates that each student have an Individualized Education Program (IEP) that identifies appropriate transition services that are needed for the student. IDEA was last amended in 2004.

### **What is the Rehabilitation Act and why is it so important to transition?**

The Rehabilitation Act is federal legislation designed to assist persons with disabilities to prepare for, obtain and maintain employment consistent with their interests, abilities and capabilities in the context of a state/federal partnership. Transition services for youth leading to employment were one of the priorities for Congress in the most recent amendments to the Rehabilitation Act. The Rehabilitation Act also provides states with funding for independent living services, supported employment and client assistance services. Last amended in 1998, the Rehabilitation Act added provisions to ensure that people with disabilities have increased choices in services and service providers (informed choice), improved employment outcomes and a better aligned vocational rehabilitation system with the workforce development system (Michigan Works!).

## **EDUCATION AND MRS PARTNERSHIP**

### **How do all the pieces of transition fit together and who is responsible for what?**

There is no single prescription for making all the pieces fit. The basis of the transition process is “a coordinated set of activities.” Each transition partner works collaboratively to make the pieces fit in a manner that honors the student’s interests, aptitudes, abilities, needs, priorities and informed choice. Schools have primary responsibility for transition services prior to graduation. MRS is responsible for providing vocational rehabilitation services leading to employment for eligible students. Community Mental Health (CMH) may have responsibilities related to supported employment, independent living, or other mental health services. These broad parameters must be elastic to meet the needs of individual students in the communities in which they live, recognizing the funding restrictions of each partner.

### **What is an interagency agreement?**

An interagency agreement is written between MRS district offices and local educational partners specifying roles and responsibilities of partners and sets goals for each year. Expectations of the working relationship between MRS and schools are often detailed in interagency agreements. Interagency agreements are reviewed and updated each year.

### **What is typically considered educations’ responsibility in transition?**

Education provides transition services required under 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 Individualized Plan for Employment (IPE). These services include:

- Complete an IPE before the student leaves school,
- Coordinate the IPE with the Individualized Education Program (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 individualized rehabilitation services necessary to reach job goals,
- And provide expertise regarding workplace adjustment and accommodations.

### **What is the role of transition coordinators in the transition process?**

Transition coordinators hired by school districts have knowledge about federal and state education laws, 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 the implementation of the transition service grants which includes data collection for 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 role of MRS counselors in the transition process shifts as students near graduation but is always focused on preparation for, and acquisition of, employment. Counselors usually become involved with students around age 16. Depending upon the individual, MRS may be involved as early as age 14, or older (if a student ages out of Special Education at age 26). At times, counselors may function as vocational/career counselors, consultants, or as service coordinators. As the time for exiting school approaches, MRS counselors will take a more active

role in planning and arranging services that are needed for individuals to progress toward employment outcomes. Prior to graduation, an Individual Plan for Employment (IPE) must be completed for eligible students. After graduation, counselors take the lead role in assisting students towards the achievement of his/her postsecondary training and employment goals as school partner's responsibility for post school activities ends.

### **What are the responsibilities of other agencies (CMH, DHS, MWAs, CILs) in providing transition services?**

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 Community Mental Health (CMH), Department of Human Services (DHS), Michigan Works! Agencies (MWAs) and Centers for Independent Living (CILs). Each agency has some statutory provisions and/or service policies about their role in transition or youth services. The concept of transition as a coordinated set of activities with an outcome-oriented process is reflected in the federal and state legislation and code that direct the activities of Community Mental Health Services Programs (CMHSP) and Department of Human Services (DHS).

The Individuals with Disabilities Education Act (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 well coordinated, a variety of agencies come together in cooperation with educational entities to support student's unique transition needs and goals. IDEA also requires that the local education agency (LEA, i.e. school) invite agencies who are likely to pay for or provide transition services to the student's IEP. The law stops short of requiring attendance by those identified agencies.

### **How can counselors and schools best use other resources?**

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

When working with students, listening and understanding student's needs, interests, and goals will help to determine which resources are needed. Assuring that each student has a complete, up-to-date EDP goes a long way in helping to sort out what agencies and services are appropriate to involve. Through engaging in collaborative conversations, all community partners can develop a unique plan to support students in achieving his/her individualized goals.

### **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 IDEA and the Rehabilitation Act are the same for the whole state, each community is different and offers unique opportunities and challenges. Funding that is 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 responsibility to access and develop effective programs with the best interest of students in mind.

MRS and the Department of Education are taking steps to identify and promote best practice and evidence-based practices to bring increased consistency to transition services statewide.



This is an ongoing process as new data become available and new programs and practices are identified and communicated to field staff.

During the past several years, a shared focus on students' post-school outcomes has evolved from the IDEA requirement that each state survey students, and report whether or not they are employed, or enrolled in post-secondary education, or both, within one year of exit from school. This change focuses both education and MRS on post school outcomes which may lead to more consistency.

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

Cooperation depends on a foundation of positive relationships and trust. It is incumbent upon all individuals involved to develop effective working relationships. Cooperation may be hampered by a lack of understanding of the limitations and realities under which people from different agencies work. At other times, there is not a clear understanding of how cooperation will benefit both schools and MRS.

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 district or site managers, counselors, and special educators and/or participation in joint training sessions. In difficult situations, mediation may be helpful, provided by either a supervisor or an outside consultant.

### **Can MRS transition services be provided in schools where there are no cash match agreements?**

Yes. However, without a cash match agreement, MRS services may be provided somewhat differently. Cash match agreements allow MRS to increase capacity to serve a targeted group of students and often allow MRS to have additional staff working with students. Because of the additional funds and resources, MRS can reach into schools providing services earlier to a larger number of students. Without these additional funds and resources, students, families and teachers may need to take more responsibility to reach out for services and often need to contact the MRS office directly for an appointment to apply for MRS services.

## **TRANSITION SERVICES**

### **MRS REFERRALS AND ELIGIBILITY**

#### **Are all special education students 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, they are not an appropriate candidate for MRS services. Students are determined eligible for MRS based on the same factors and policies as any other potential MRS customer:

- 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

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

Counselors should work closely with school personnel to facilitate appropriate referrals and referral processes. Generally, those students who desire an employment outcome and who will require vocational rehabilitation services to achieve those outcomes, should be referred to MRS. School personnel may need to be educated and reminded about the criteria for appropriate referrals. Ongoing communication between MRS and schools is essential for a positive referral relationship and process.

### **How early in a student's school career should MRS become involved?**

In most cases, MRS will become involved during the last two years of high school. However, student's unique needs will determine when MRS becomes involved. A counselor, acting in the role of consultant, may attend a student's IEP as early as age 14, to provide information and share expertise. The regulations do not mandate transition services for all students at age 14 or younger; however, the provision of services could have a significant effect on students, especially those likely to drop out before age 16.

Michigan requires each school to offer the opportunity to complete an Educational Development Plan (EDP) no later than the 7th grade. This begins to establish direction for student. A statement of needed transition services must be included in IEP after age 16. MRS becomes actively involved prior to a student graduating or exiting high school or when an eligible student requires vocational rehabilitation services to obtain an employment outcome while in high school.

When it becomes apparent that MRS services are required for the student to progress towards employment, a case should be opened. This may happen prior to the senior or even junior year in some cases. Good communication with school partners will help education staff sort out when it is appropriate to refer students to MRS.

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

Students are entitled to a free and appropriate education meaning that all students with disabilities in Michigan have the right to receive an education. When students apply for MRS (vocational rehabilitation services), students have the right to apply, but must meet the eligibility criteria to receive those services. The services students are eligible for differ depending on each student's vocational needs. Students can also lose their eligibility by not following through with agreements such as 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.

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

At minimum, MRS counselors need documentation regarding student's disabilities to assess eligibility for services. Other school records are extremely helpful in planning for needed support services that students may require. Therefore, the following school records are needed if they are available and applicable:

- The most recent psychological assessment,
- Medical information documenting disabilities,
- The last IEP including the MET,

- Vocational assessment reports,
- Educational development plan (EDP),
- Work evaluation reports,
- Social work reports,
- Speech and language reports,
- Occupational therapy reports,
- Physical therapy reports,
- Copy of driver's license,
- Copy of social security card,
- Present level of academic achievement and functional performance (PLAFFP) statements,
- And summary of performance (SOP).

After making the initial referral, it may be necessary for school staff to forward additional documents as they become available or as information is updated. This requires ongoing communication between MRS and school staff to ensure that additional information is provided to MRS as it is generated and becomes available.

**What is the best way to coordinate all the referral paperwork (application, referral form, releases and disability documentation) so that counselors receive needed documents in a timely manner and so all the dates match in AWARE (MRS Case Management System)?**

It is helpful when interagency agreements clarify what school personnel are responsible to do when referring students to MRS and what forms and documents are needed. Some MRS counselors for example, prefer the referrals come in a complete packet with all the supporting documents and forms including a signed application while other MRS counselors prefer to meet face to face with all potential customers and review the application. Whatever the process, it requires ongoing communication between MRS and school personnel to make sure the system is working well.

Often completed and signed applications are sent to MRS without supporting documents. When this happens, MRS needs to contact the referring person to remind them about the referral process and ask supporting documents to be sent. For an individual to complete the application process, applications must be accompanied with a signed release so MRS can obtain information to assess eligibility. The date that MRS uses as the application date is the date entered in AWARE, not the date on the application.

**What is the best way to handle MRS being overwhelmed by IEP invitations?**

First, MRS needs to speak to the individuals who initiated the invitations. It may be that MRS is invited to all IEPs as a courtesy or just to make sure the school has met the IDEA requirement of inviting a service provider when a referral to an adult service agency is anticipated. If more IEP invitations are received than are possible to attend, a counselor might consider speaking with school personnel to make sure to referrals are all appropriate and develop a workable process for making referrals.

Referring individuals can greatly assist MRS counselors by contacting MRS in advance of scheduling IEPs, to make sure the MRS counselor has time in their schedule to attend meetings. Grouping IEPs is often an effective strategy to help MRS manage the logistics of attending multiple IEPs on different days, especially when counselors are traveling significant distances to get to meetings.

In situations where schools choose to continue sending invitations for all IEPs, it may need to be communicated to school personnel that counselors may disregard these invitations unless preceded or accompanied by a phone call or referral packet. Another strategy is for MRS to communicate to school partners in advance that MRS will only attend IEPs where an MRS referral has already been made.

### **What is a typical timeline for determining 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 typically 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 to case files 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.

### **Does an individual with a disability qualify for special education if he/she has already earned a GED?**

Yes. Under normal circumstances when a student has graduated, he or she is no longer eligible for special education services; however, obtaining a GED is not equivalent to graduation from high school therefore a student who earns a GED may still be eligible for special education services up to age 26.

### **Can students with disabilities receive MRS services if they are not currently involved in special education programming?**

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 should be determined on the basis of "a physical or mental impairment that constitutes or results in a substantial impediment to employment and require MRS services to prepare for, secure, retain or regain employment".

### **Can students with disabilities attending private, charter or home schools receive MRS services?**

Yes. MRS vocational rehabilitation services are available to all eligible students regardless of whether or not they are attending public or charter schools or other schools such as private or home schools. MRS counselors can access cash match funds to purchase services if there is a cash match agreement 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 that schools have to provide a free and appropriate education under IDEA.

### **Because school psychologists don't diagnose ADD or ADHD, what should counselors do to make those students eligible for MRS?**

An IEP certifies that a person is presumed eligible for MRS services under the Rehabilitation Act. However, this information may not be enough to determine an individual's rehabilitation needs and may need to be supplemented. With signed releases, counselors can contact a student's treating physician for more detailed diagnostic information. If the available information is not adequate, diagnostic evaluations and vocational assessments may be purchased by MRS while the student is still in school.

### **How do we best 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: one in which a student has a preexisting disability prior to the auto accident and a second in which a student does not have a preexisting disability. In both situations, counselors should contact the MRS disability management program 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. Therefore, the person may still be eligible for MRS services while at the same time receiving insurance services.

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, a dual case can be considered. When it is agreed upon that there will be a dual case, the dual case will be managed by both a case manager from the insurance carrier and an MRS counselor.

In both cases, the insurance carrier has primary responsibility for vocational rehabilitation costs when the disability is due to a motor vehicle accident. Counselors, disability management counselors 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.

## **ASSESSMENT**

### **What is the difference between transition assessments and vocational assessments/evaluations?**

Transition assessments are holistic assessments of students overall functioning where vocational assessments/evaluations tend to focus more on work-related areas. Following is the MI TOP's (Michigan Transition Outcome Project) definition of transition assessment:

- A planned, continuous process of obtaining, organizing, and using information to assist individuals with disabilities of all ages and their families in making all critical transitions in students' lives both successful and satisfying. – Clark 1998
- A process that is measurable, demonstrates improvement and leads towards the student's desired post-secondary goals (vision)
- Evolves over time, is ongoing, and is not a one time or annual event

- Requires student engagement
- Involves more than one person
- Involves more than one tool
- Reveals what skills the student possesses and what skills the student must acquire
- Can be formal, informal, or both
- Completed for all students with an IEP
- Initial assessment may indicate area(s) in need of a more in-depth assessment, IEP goals, transition services and/or transition activities

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.

### **Are schools responsible to provide vocational assessments/evaluations?**

When vocational assessments or 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 free and appropriate public education, 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 evaluation can be funded by MRS. Vocational assessment is one area where there is frequent overlap of responsibility between schools and MRS.

### **What are some of the instruments and measures used in school vocational assessments?**

Instruments and measures vary from school district to school district. All should include some student, parent, and staff interviews and/or questionnaires. Some instruments that may be used include: Self Determination Scales, Adaptive Skills Inventories (ESTR or TPI), ACT Products (Plan, Explore or Discover), Work Keys, OASIS 2 (aptitude), Checklist of Associated Work Skills, MOIS, Holland Self Directed Search (Interest Inventory), My Dream Explorer, Career Futures and Career Cruising.

Remember to use and build upon information developed through the EDP process!

### **Schools now permit (and often encourage) updated testing to be waived by students and parents. In some cases, the last testing was done when the student was in 7th grade. Is there something that can be done to encourage testing closer to graduation?**

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. 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 done by schools and is needed for rehabilitation planning, MRS may purchase the evaluation.

### **Why is 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 change 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.

### **What is the Educational Development Plan (EDP) and how can it be used in transition?**

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 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.

### **How can MRS counselors best use information from the Summary of Performance (SOP)?**

The SOP is a separate educational document from the IEP and is developed in lieu of an Exit IEP. The SOP can not be used alone to make students eligible for MRS unless it includes a statement of the student's disability and is signed by the school psychologist. However, it can be used as a good source of information concerning the student's functional abilities. The SOP may helpful in determining what students need are and therefore, what vocational rehabilitation services are needed for successful employment. The SOP includes:

- Background information,
- Postsecondary goals,
- Academic and functional levels of performance,
- Recommendations to assist the student in meeting his/her postsecondary goals,
- And the student's input.

### **May assessments/interest inventories from Educational Development Plans (EDPs) be used as the Transition Assessment information that is a required part of the transition plan?**

The EDP has helpful information for transition. The EDP lists 'short' and 'long' term goals, which can be helpful to note in the "Courses of Study" section of the IEP, such as plans after high school including Career and Technical Training and/or college. In addition, the interest

inventories used during the EDP process also identify potential career and employment goals that can be listed in the "Student's Post Secondary Vision (Goal)" portion of the IEP.

Often electronic EDPs offer an interest assessment component but do not provide the student with formal data on "needed transition activities or services" to achieve the goals, such as statements addressing needs/goals in "adult living, daily living skills, functional evaluation (assessment), community experiences, education and other" that are required when providing a Transition Assessment.

Both an EDP and Transition Assessment data should be used together when writing the IEP. The EDP does not identify all of the student's post secondary goals, which are a critical driving factor for the IEP. Most Transition Assessments are in direct alignment with the federal legislation in regards to the requirements for data relating to transition in the IEP. Transition Assessment data is also key in writing the Present Level of Academic Achievement and Functional Performance (PLAAFP), documented in the IEP, which specifies the student's specific needs for learning. The EDP would not provide you with this information. Transition data from Transition Assessments are also essential when crafting the SOP.

Transition Assessments provides students with information that pertains to the many areas of transition and gives students an opportunity to select goals that are in alignment with their post secondary vision. Many Transition Assessment tools, such as ESTR, does this easily and also fosters the concept of self determination with the student and/or family assisting in selecting goals. (Answer to this question was provided by Rick Ballentine from the Ingham Intermediate School District.)

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

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

All students are required to have an educational development plan (EDP) which indicates a career direction and students with disabilities have a postsecondary vision statement in the IEP which drives the transition process. The postsecondary vision includes students' statements related to adult living, career/employment goals, community participation and postsecondary education or future training. Therefore, counselors can reference these documents to see what goals students have 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 job shadowing, job try-outs or work experience to get more information before selecting a vocational 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 information or through vocational counseling. In situations like this, it is important to remember that a career pathway cannot be used as a job goal at case closure. However, it does meet the requirement of writing a plan and allows MRS to begin to provide rehabilitation services, which for some individuals is a good option.

### **What should counselors do to meet the policy requirement to write IPEs 90 days after a student has been made eligible for MRS services in cases where students are not ready to commit to a job goal?**



After the completion of the eligibility determination and the assessment of vocational 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, the activities or services planned to complete the IPE, and the anticipated IPE completion date. The student and counselor have to option to write a plan using a career pathway and amend the plan when more information is gathered to select a specific vocational goal. It is essential however that the IPE be written prior to graduation.

The IPE should be coordinated with the IEP. This is another reason for close collaboration with educational partners. When cases are open well before graduation and there is good communication between schools and MRS, students and counselors have the opportunity to build upon the school experience and develop meaningful and seamless IPEs.

### **What should counselors do when referrals are received right before graduation and there is not enough time to formulate an IPE as required by the Rehabilitation Act?**

The Rehabilitation Act requirement is applicable only for students who are found eligible for MRS services prior to graduation. Therefore, there are two options counselors can exercise to manage late referrals and still meet federal IPE completion requirements.

- 1) Briefly delay opening the case until the student has graduated, or
- 2) Briefly delay determination of eligibility until the student has graduated.

A brief delay in either of these activities will still be within the norms of the federal requirements and good customer service. These options should not be undertaken if they mean that timely services will not be delivered to students. The best strategy is to work with your referral sources proactively so last minute referrals are kept to a minimum.

### **What should happen when students appear to be unrealistic in their career goals and unwilling to change their career paths?**

All MRS customers are entitled to make an informed choice. It is the counselor’s responsibility to provide an opportunity for dialogue and accurate information for the student 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 a trial experience to help a student learn about his/her own capacities and requirements of jobs in realistic settings. Real experiences are often a great teacher and students may opt out, or the counselor may learn that the student’s determination is 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 focuses on becoming a firefighter, perhaps a job in a fire station as a maintenance worker or dispatcher 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.

### **How do we address students who want to attend college, whose academic ability is at 3rd- 4th grade reading, writing and math levels?**

Community colleges offer remedial reading, writing and math courses and many students must participate in remediation for years before taking college level classes. MCTI, adult education,

Michigan Works! and many other programs are available to enhance literacy and may be better options.

Early intervention while students are still in high school is helpful for students who want to attend college who have low academic skills. Counselors may advise that students in this situation take 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.

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 feel it is something that they should do and they are lacking in information about other options. 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 postsecondary training. MRS applies a means test to determine if MRS financial support can be offered. MRS does not and can not support college for college sake. College coursework must be determined to be appropriate, necessary and likely to result in employment.

Community colleges provide open enrollment and therefore everyone 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 focus on employment-related activities.

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

When a student is a minor, not only do parents or legal 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 and legal guardian signatures can be a challenge. Placing a phone call to parents and legal 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 the best way 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 legal guardians. MRS counselors now need to get signed releases from students (who are now young adults) in order to share information with parents. Students have the right to revoke those releases at any time.

## **PAYMENT FOR SERVICES**

### **What is a cash match agreement?**

A cash match agreement is created to expand vocational rehabilitation services to a targeted group of individuals such as students with disabilities. Local cooperating community partners (such as school districts or intermediate schools districts) contribute funds that are used by

MRS to capture federal funds. With MRS and school partnerships, these combined funds are used to provide specific rehabilitation services including employment assistance and other supports for students with disabilities.

### **How is it decided whether MRS or schools should pay for appropriate transition services?**

Because of the shared mandate to provide transition services that MRS and the Department of Education share, there are gray areas where both partners can pay for services. A school district may agree to fund a student's vocational assessment as part of a free and appropriate education. In another situation, MRS may agree to fund a student's vocational evaluation because specific information is essential in establishing the student's IPE.

Dialogue between MRS and school partners should be ongoing to help clarify roles and responsibilities. After graduation, the school no longer has any responsibility. MRS coordinates services using comparable benefits, student and family contribution and MRS funds as with any other MRS customer.

### **When does MRS become responsible to pay for vocational services?**

MRS is responsible for payment of vocational rehabilitation services to meet an IPE employment goal in the absence of comparable benefits or services. When MRS pays for services will vary from student to student depending upon individual needs, circumstances and specific resources for funding. Prior to graduation, MRS is responsible for expenses directly related to vocational rehabilitation services in support of IPE job goals that are not part of a free and appropriate public education. MRS policy does not allow MRS to supplant funds for services that are the school's responsibility.

### **What types of services may MRS fund for transition students?**

The following services can be provided to students when needed to assess MRS eligibility and rehabilitation needs, or to achieve vocational goals and objectives indicated in the student's IPE:

- Medical, psychological, or vocational evaluations necessary for planning or diagnosis if existing information about the student is insufficient,
- Vocational counseling and career planning,
- Job training arranged through adult education, trade, technical, business schools, colleges, or employers,
- Assistance with any additional costs for maintenance and transportation as a result of the customer's participation in a rehabilitation program,
- Personal physical aids such as prosthetic and orthopedic devices, hearing aids, wheelchairs, hand controls, etc. that are necessary for the student to achieve employment,
- Job and task analysis specific to the achievement of a vocational goal,
- Rehabilitation engineering,
- Accommodation services and assistive technology, personal adjustment counseling,
- Tools, equipment, uniforms and license fees needed for work or training beyond that routinely provided for all students in technical training and work-study programs,
- Job placement assistance and follow-up,
- IPE related job coaching services,
- IPE related personal assistance services,
- Independent living services and/or instruction to facilitate or maintain employment,
- And post-employment services needed to maintain employment.

### **Who dictates how dollars from cash match agreements are used?**

Michigan Rehabilitation Services. Once local funds are pooled with matching federal dollars, they cease being local funds per the language of cash match agreements. Some school districts ask MRS to account for funds spent on students in secondary education to satisfy the need for schools to account for matched dollars to ensure that an amount equal to the match dollars were spent on in-school youth.

### **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, then the responsibility to pay for the student coursework falls on the school district or the parent. MRS may not supplant the school's responsibility for a free and appropriate education. In individual circumstances where a student is taking classes that are necessary to achieve an IPE job goal, it is possible for MRS to fund college coursework while a student is still in high school. 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.

### **Can cash match funds provided by school districts, be used for students who have graduated?**

Yes. Cash Match funds provided by school districts 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 school match dollars only on in-school youth and MRS federal dollars for services on students that are post graduation from high school, although the match and federal dollars are, in fact, pooled.

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

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 graduation from high school.

MRS may purchase assistive technology for transition 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.

**How can more work experiences be provided to students? Students often want to be paid, but MRS doesn't always have enough funds to provide this service. Are volunteer activities legal?**

Volunteer activity is definitely legal. Schools have the option to set up CBIs (Community-Based Instruction), where students work in the community for school credit. Often these positions are unpaid. Using comparable benefits, MRS and schools can collaborate with WIA so that some students can gain work experience, earn school credit and get paid at the same time. Keep in mind that earning may affect SSI benefits. The Student Earned Income Exclusion formula as a helpful benefit to offset earnings while a student is in high school.

In some cases, MRS can fund on-the-job training (OJT) where an employer receives funds to train a student and agrees to put the student on payroll. Another option is an employer of record (EOR) arrangement where a third party (such as a Community Rehabilitation Program) receives funds from MRS to pay a student while they receive on-the-job training. In these situations, the third party employer puts the student on their payroll. Both of these arrangements are short-term and can only be considered if it is believed that the experience is likely to lead to employment.

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

Since 1998, driver training is no longer a state mandated education service. Thus, under the current law, driver training is a parental responsibility. 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 under an IPE. 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's 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.

**POSTSECONDARY TRAINING AND FINANCIAL AID**

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

The Michigan Career and Technical Institute (MCTI) is a residential Community Rehabilitation Center (CRC) administered by the Michigan Rehabilitation Services (MRS), a bureau of the Michigan Department of Labor and Economic Growth (DLEG). 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 consumers, primarily young adults with cognitive and/or mental and emotional disabilities who need intensive supports to succeed in postsecondary education. MCTI is located on the edge of Pine Lake in rural western Michigan, about 20 miles from Kalamazoo. The 72-acre property includes classrooms and training facilities, a 350-bed dormitory, cafeteria, library, and leisure facilities in a single building, with adjacent maintenance facilities.

MCTI provides vocational training specific to the following occupations:

- Automotive Technology,
- Cabinetmaking/Millwork,
- Certified Nursing Assistant,
- Culinary Arts, Custodial,

- Customer Service,
- Electronics,
- Graphic Communications,
- Grounds Maintenance and Landscaping,
- Machine Technology,
- Office Automation,
- And Retail Marketing.

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 consumers who attend MCTI.

### **Which students are the best 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 in a residential environment in order to be successful at MCTI. As with all postsecondary institution, assessment and planning is essential to ensure a student's success at MCTI.

### **What is MRS' role in postsecondary education in terms of planning and provision for support?**

MRS should be 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.

### **How do you respond to the customer who asks, "Why do I need to apply for financial aid? Why can't MRS cover all of my postsecondary costs?"**

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.

## **How should counselors handle 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 move ahead of MRS in the process. Problems arise when the plans 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 at the postsecondary level?**

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. MI-AHEAD (Michigan Association of Higher Education and Disabilities) 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 IDEA, therefore postsecondary institutions do not automatically accept recommendations for accommodations that are written in IEPs. Each institution determines what accommodations are reasonable. In college, students with disabilities are covered under ADA which allows for "reasonable accommodations". 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 schools typically provide such as modifying curriculum or limiting assignments are not considered reasonable accommodations at the college level.

## **SUPPORTED EMPLOYMENT/JOB COACHING**

### **What is MRS' role in supported employment?**

MRS assists schools in determining which students are likely to need and qualify for supported employment services. When supported employment services for transition students are required, they should be part of an IPE and coordinated with Community Mental Health (CMH). Any MRS funded supported employment activities and services that occur while a student is still enrolled in school, that are funded by MRS, should be determined not part of a free and appropriate public education.

### **How can MRS and schools assist students and families in receiving supported employment services and long-term intensive job supports from CMH?**

One of the most important roles that MRS counselors can play is helping to coordinate referrals to CMH for students likely to be eligible for CMH services, supported employment and long-term intensive job supports or follow-along services. Teachers, parents and students need to understand the importance of applying for CMH services in the student's last year of high school and how to access CMH and what information will be needed by CMH to determine eligibility.

When students are eligible for MRS and CMH services, they are in a position to access supported employment services as an adult. If it is likely that students will require supported employment services, representatives from MRS, CMH and the CRP should be invited to students exit IEP to coordinate services. Laying the groundwork for this while a student is still in high school ensures a seamless transition to adult supported employment services.

It is through CMH provider supported employment services that students receive long-term, job supports. While MRS often funds job placement and short term, intensive job coaching for supported employment customers, CMH provides the long-term, ongoing job supports after the student leaves school. This emphasizes the importance of applying for CMH supported employment services well before the student leaves school.

**When is it appropriate for MRS to fund job coaching services to transition youth who are still in high school?**

Job coaching may be funded by MRS if the student is available to work, has an appropriate job goal that is consistent with a student's interest, aptitudes and abilities, requires job coaching to be successful and has an IPE specifying job coaching as a needed service, and if job coaching is not clearly in support of a free and appropriate education service.

**Can MRS fund job coaching for summer jobs for transition students?**

Yes. Summer employment is not typically part of a free and appropriate education. MRS counselors can provide short-term job coaching for 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 be consistent with their IPE and/or the employment should have a strong potential of becoming permanent.