Washington State
Rehabilitation Council

Meeting Materials Packet

November 2026

November 2026 Quarterly Meeting

Meeting Materials Packet

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Washington State Rehabilitation Council

Quarterly Meeting Agenda

Thursday, November 12, 2026

9:00am – 12:30pm

Join Zoom Meeting

TIME	PRESENTER	TOPIC
9:00 AM	Michele Stelovich	**Call to Order, Executive Committee** ○ Vote: Approval of August 2026 quarterly meeting minutes
9:20	Pablo Villarreal	**DVR Interim Director updates**
10:00	Jamie Grund	**Fiscal updates**
10:20		**BREAK**
10:35	Shelby Satko	**National Conference Highlights**
10:50	Jen Tabiando Verena Strydom Alexandra Toney Michele Stelovich	**Council Priority Updates** • **Policy & Planning** ○ Artificial Intelligence • **CSPE** ○ Customer Satisfaction Improvement Project • **Partnership** ○ Office of Superintendent of Public Instruction ▪ 2026 Update of the Transition Collaborative Summative Report ○ Workforce Board ○ Tribal Vocational Rehabilitation ○ Statewide Independent Living Council • **Executive** ○ Annual Report ○ Recruitment ○ 2027 Quarterly Meeting Structure
12:00	Michele Stelovich	**Wrap up Discussion**
12:30 PM		**ADJOURN**

Please note: Times above are estimates only. The Washington State Rehabilitation Council reserves the right to change the order of the agenda. To request an accommodation, please email council staff at: WSRC@dshs.wa.gov



DVR Interim Director Updates

Presented by: Pablo Villarreal

Vision for DVR

- Focus on staff
- Participant success
- Employer engagement
- Collaborate with partner agencies

General Updates

- Submitted our plan for Priority of Service update from 5 categories to 3.
- Requested extension of State Plan Conditional Approval status.
- Attended the fall meeting of Council of State Vocational Rehabilitation Administrators.

Federal Updates

- Dear Colleague Letter (DCL-26-04) – updates to reportable individual vs participant
- Reinstitute the data element "education level at Individualized Plan for Employment (IPE)"
- Remove data elements that require documentation of comparable benefits

State Budget

- DVR did not submit Decision Packages requesting additional state appropriation
- Decision Package with reduction
- No Agency Related Legislation
- Expect Governor’s budget in mid December

Decision Package

- DVR submitted a Decision Package effectively reducing state appropriation by $1M per year.
- These were underspent funds
- No reduction to services provided to students
- Will continue to provide Pre-ETS, Assessment, Placement, Intensive Training and Youth Extended Services

Personnel:

- Added 9 non-perm support staff, 3 per region.
- Needed to support administrative functions while serving more participants from OOS waitlist and serving current participants and new applicants.

Order of Selection updates

- DVR began releasing participants June 9
- Released 700 since June
- Released 650 in November
- Planning for December release of around 400
- January larger release around 1200
- Our goal is to release around 2000 participants from the order of selection over the next 3 months.



Thank you!

Pablo.Villarreal@dshs.wa.gov

DVR Fiscal Updates

Presented by: Jamie Grund

November 2026

Division of Vocational Rehabilitation

DVR Services are provided by State and Federal VR Funds. The VR program typically receives 78.7% in Federal funds and must match least 21.3% in State funds. For detailed information on the dollar amount of Federal funds for the program, please visit Formula Grant Award Details | Rehabilitation Services Administration (ed.gov)

Budget Updates

Federal Budget FFY 27

- Currently in a continuing resolution until December 2026
- Funding is at 2026 levels while in the continuing resolution

State Budget:

- Work has begun for the Biennial 2027-29 Budget
  - Governor’s Budget will be out mid-December
- Proposed Reduction to School to Work ($1M)
  - We will continue to provide school to work services
- Reduction exercises
  - Continuing to look at other reductions

Grant update

VR Basic Support 2025

- Period ended 9/30/2026
- All grant funds were spent and Pre-ETS met

VR Basic Support 2026

- Second year of the grant
- Period ends 9/30/2027
  - Total federal grant funds - $60.9M

VR Basic Support 2027

- $12M
- Currently based on Continuing Resolution

Pre-ETS

- Exceeded Pre-ETS 15% on the 2025 Grant.
- Started spending on the 2026 Grant in April.
- Estimating BS 26 Target reached in April 2027

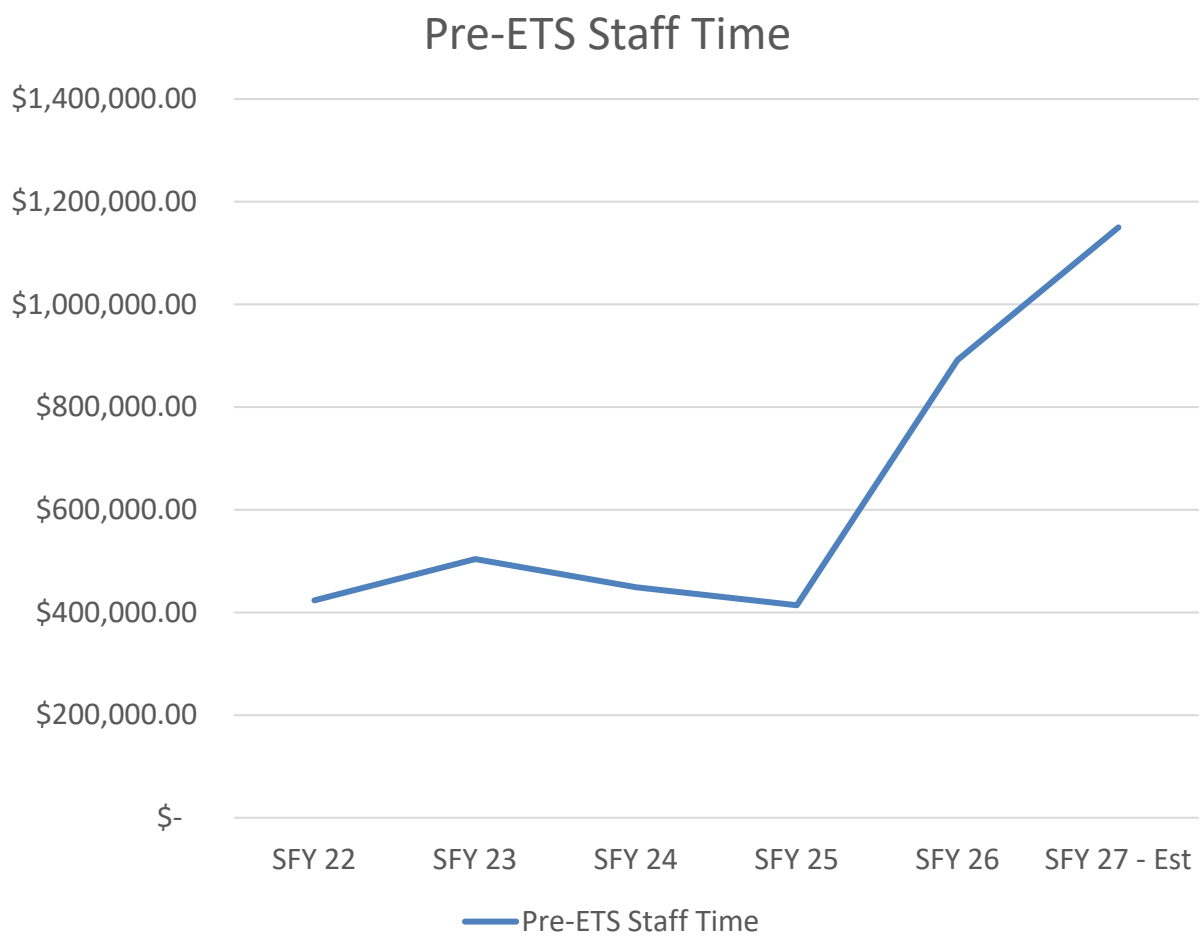
Pre-ETS by Grant

	Basic Support 23	Basic Support 24	Basic Support 25	***Basic Support 26***
Grant Award at end of period of performance (Year 1)	35,284,293	51,251,049	56,091,168	58,938,168
Reallotment Funds		4,000,000	5,000,000	2,000,000
Total basis for Pre-ETS 15%		55,251,049	61,091,168	60,938,168
15% Set Aside (minimum)	5,292,644	8,287,657	9,163,675	9,140,725
Expenditures	6,092,328	8,503,921	9,283,999	5,627,618
(Over)/under our Minimum	(799,684)	(216,264)	(120,324)	3,513,107
Target	6,000,000	8,500,000	9,300,000	9,300,000
Expenditures	*6,092,328*	*8,503,921*	9,283,999	5,627,618
(Over)/Under our Target	(92,328)	(3,921)	16,001	3,672,382

Staff Time on Pre-ETS

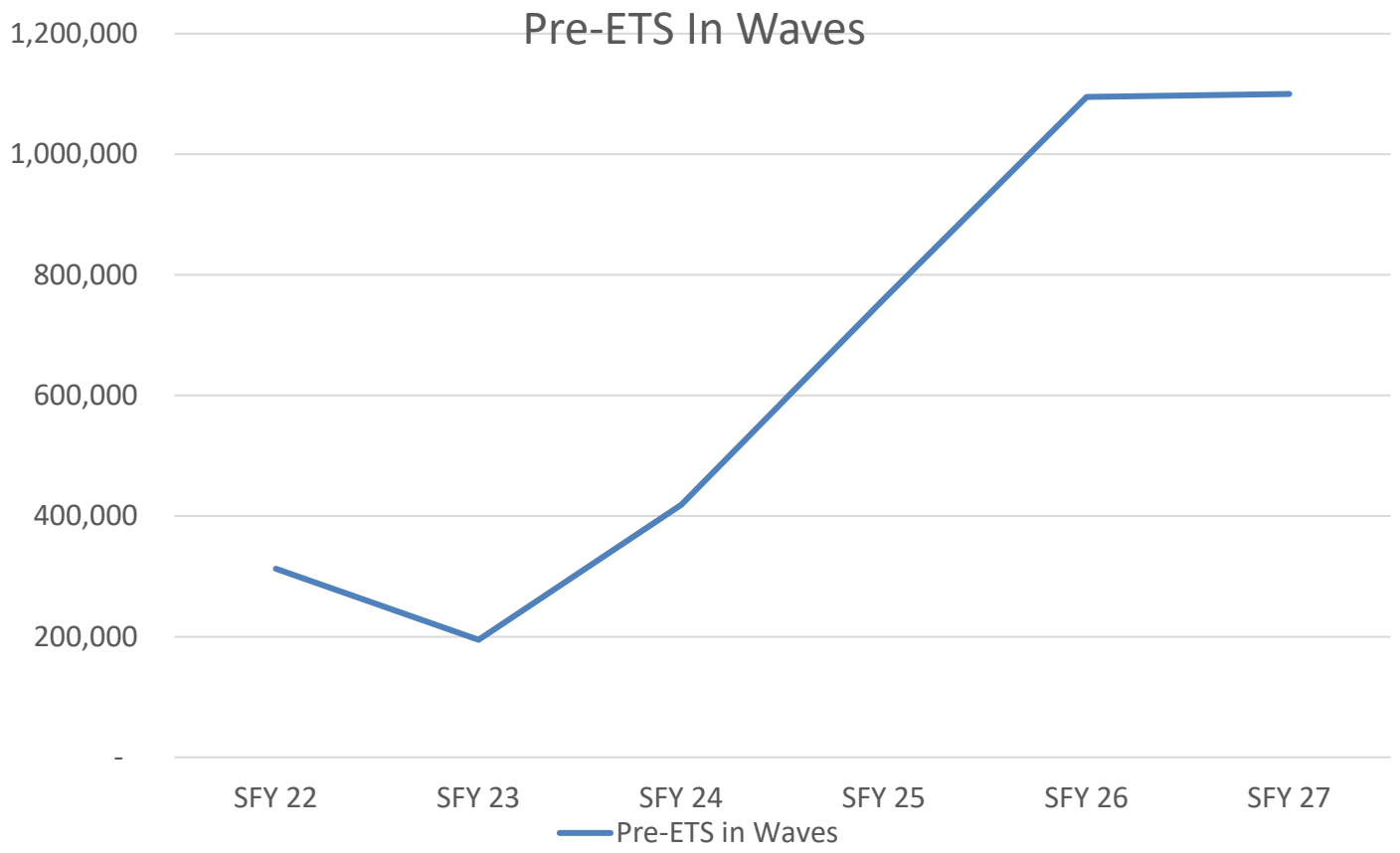
State Fiscal Year	Pre-ETS Staff Time
SFY 22	423,568
SFY 23	503,645
SFY 24	449,172
SFY 25	413,960
SFY 26	891,640
SFY 27 – Est	1,150,000

SFY 2027 – Averaging 96K a month in Salary and benefits
From time tracking



Pre-ETS In Waves

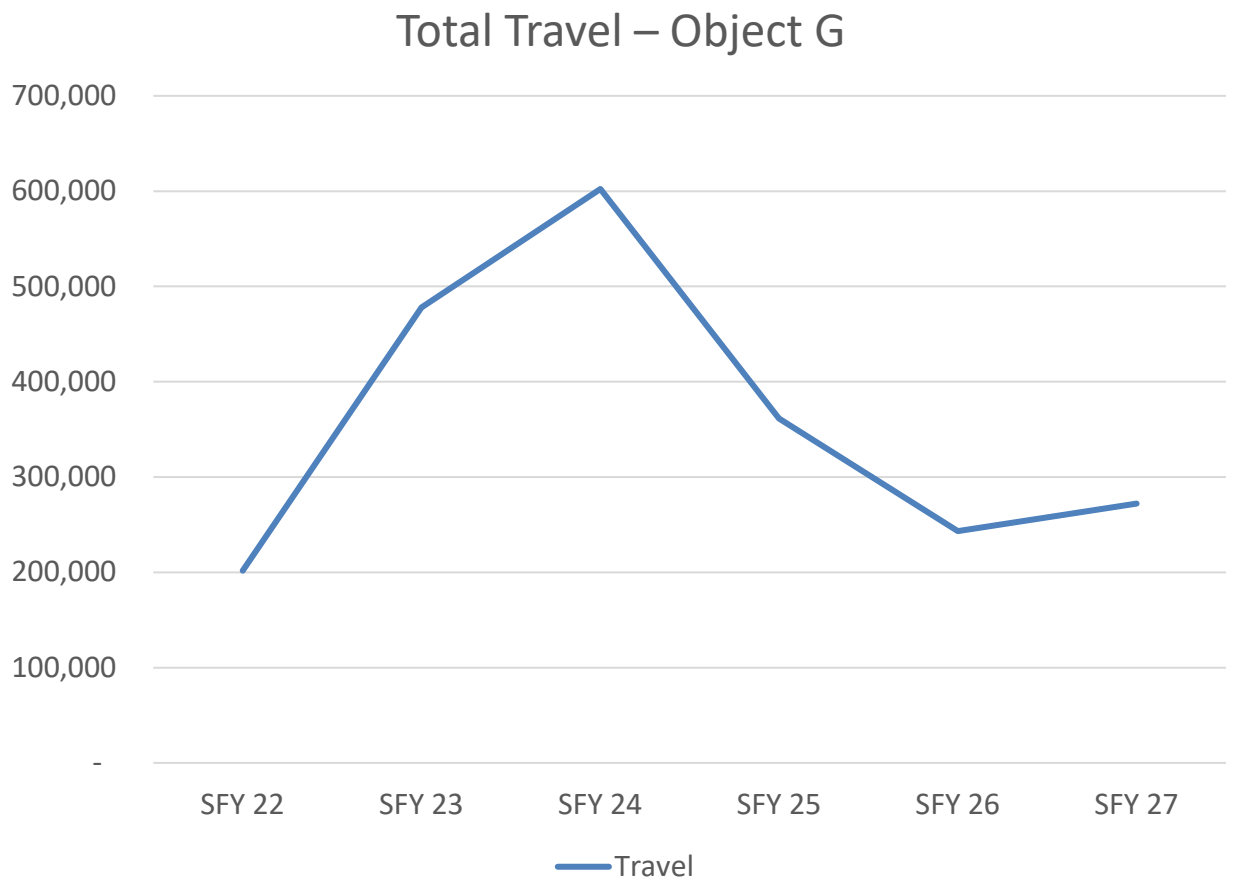
State Fiscal Year	Pre-ETS In Waves
SFY 22	312,429
SFY 23	194,838
SFY 24	418,689
SFY 25	760,030
SFY 26	1,095,116
SFY 27 Est.	1,100,000



Travel

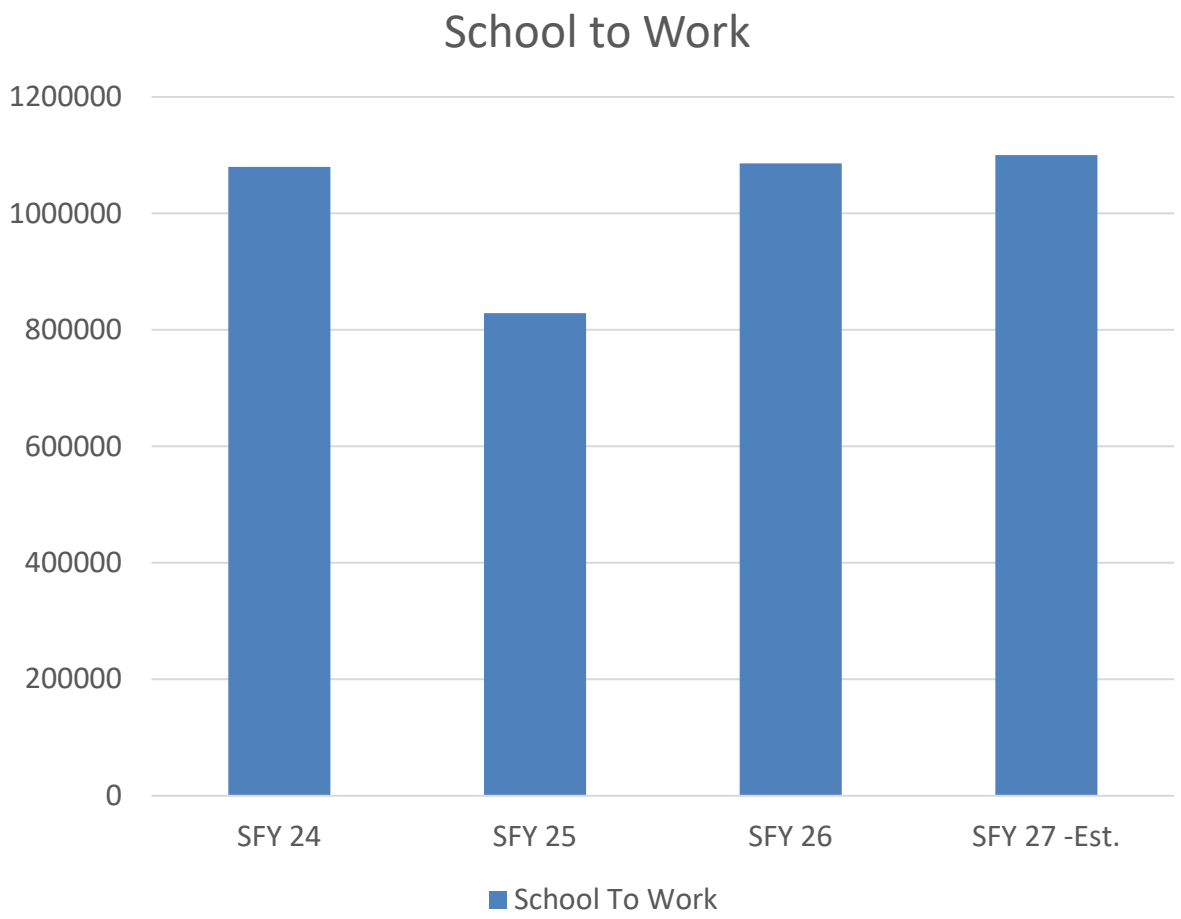
State Fiscal Year	Total Travel
SFY 22	201,746
SFY 23	477,842
SFY 24	602,262
SFY 25	361,557
SFY 26	243,381
SFY 27 – Est.	272,000

Notes: SFY 27 budget is $272,000



School To Work

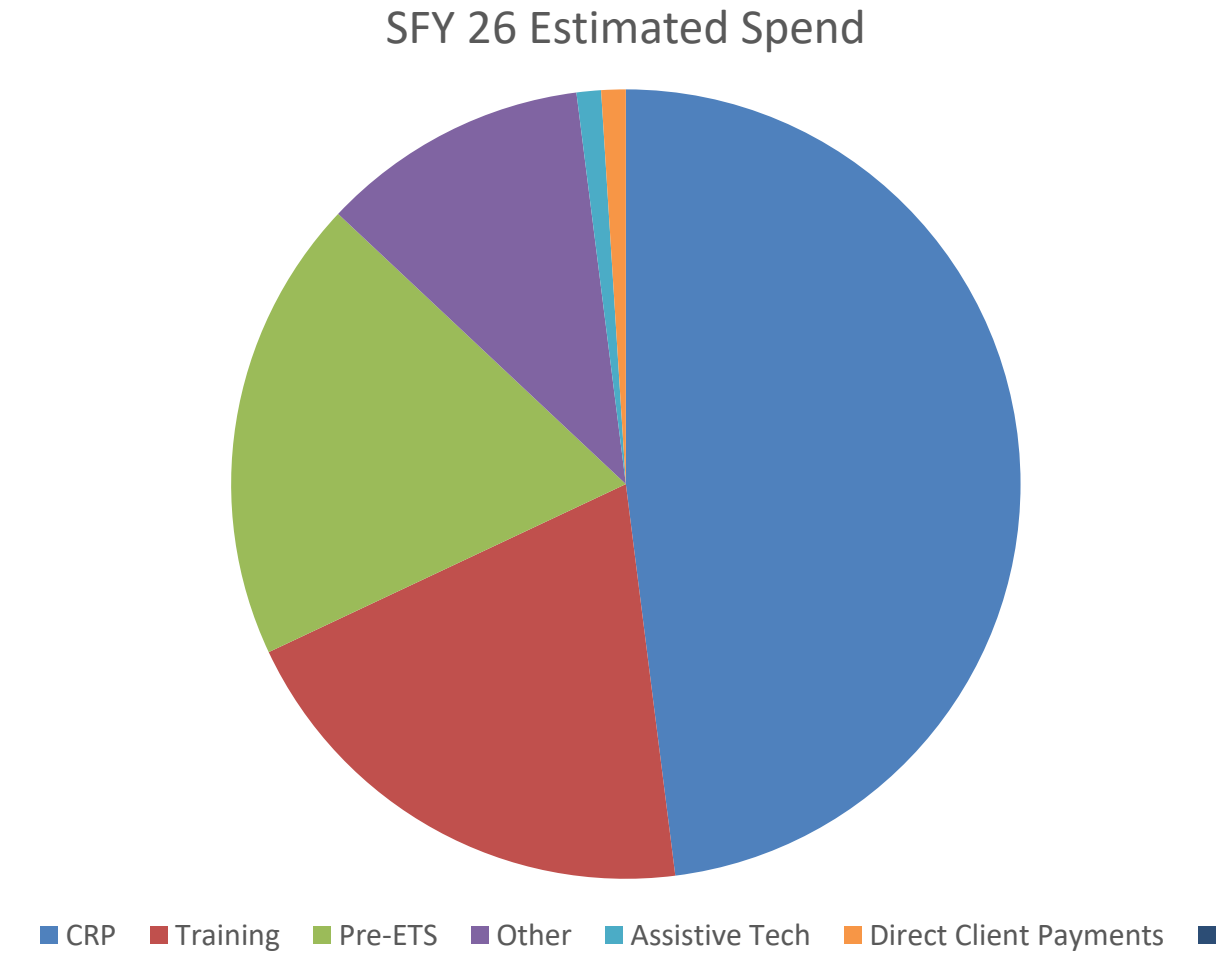
State Fiscal Year	School to Work Participant Spend
SFY 24	1,080,070
SFY 25	828,600
SFY 26	1,085,900
SFY 27 – Est.	1,100,000



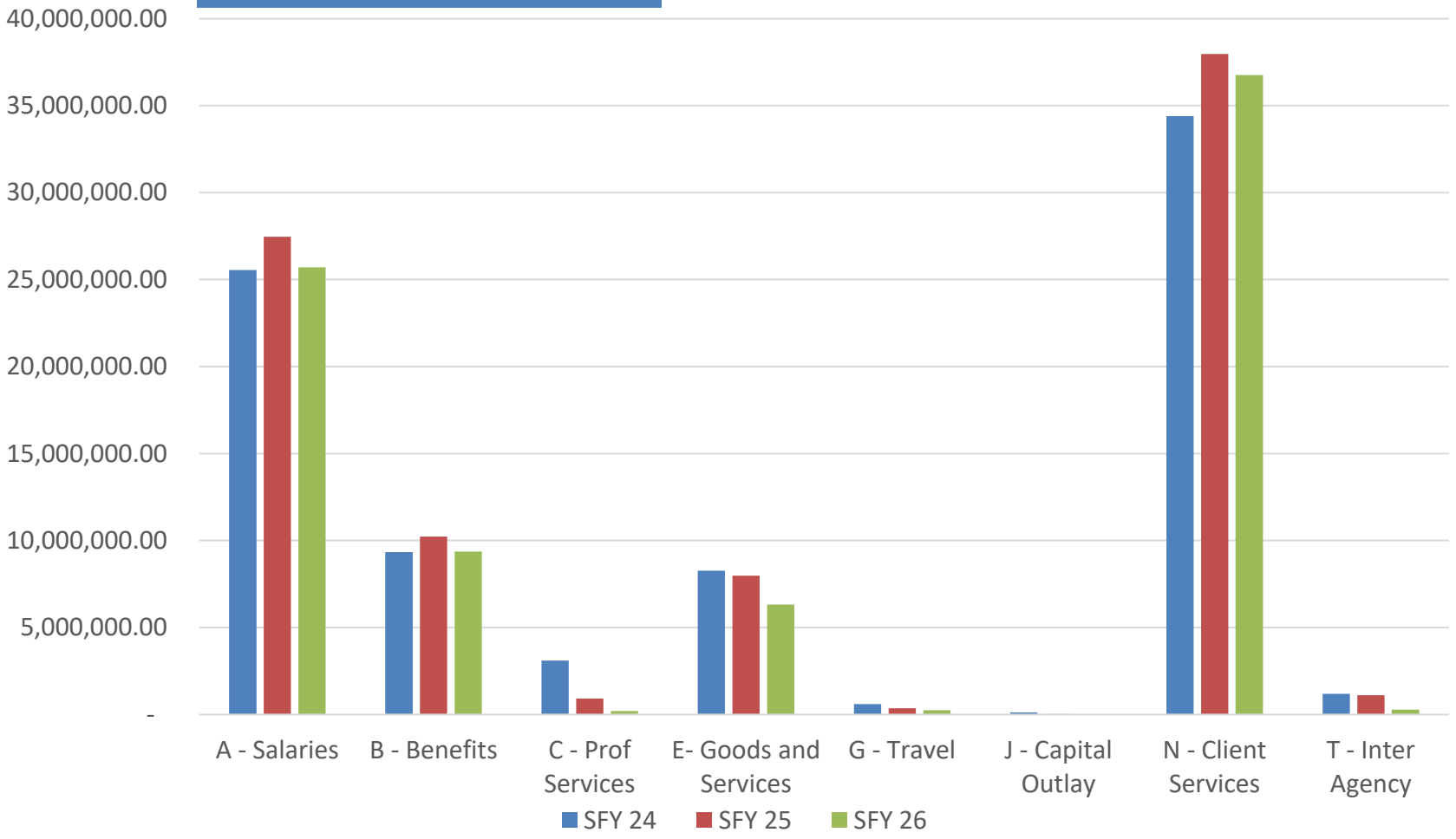
Client Service Spend

Category	Percent – SFY 27 Est.
CRP	48%
Training	20%
Pre-ETS	19%
Other	11%
Assistive Tech	1%
Direct Client Payments	1%

1. Training is college, Voc Ed, on the Job Training,
2. Other includes medical fees, transportation, computers, tools and self employment equipment.



DVR Spend



This is the total DVR spend per state fiscal year.

SFY 2024 – 82,577,834
SFY 2025 – 86,037,341
SFY 2026 – 78,888,983

*in SFY 26 our we went to a shared service model for our IT staff.

DVR Spend

Summary	SFY 25	SFY 26	SFY 27 Estimates
A – Salaries	27,457,780	25,707,418	26,477,391
B - Benefits	10,223,453	9,370,941	9,486,782
C – Professional Services	915,888	194,298	171,989
E – Goods and Services	7,973,324	6,325,723	8,964,014
G – Travel	361,557	243,381	272,000
J – Capital Outlay	26,801	16,532	50,000
N – Client Services	37,975,979	36,753,770	32,601,334
T - interagency	1,105,400	276,918	240,428
Totals	86,037,341	78,888,983	78,253,787

This is the total DVR spend per state fiscal year.

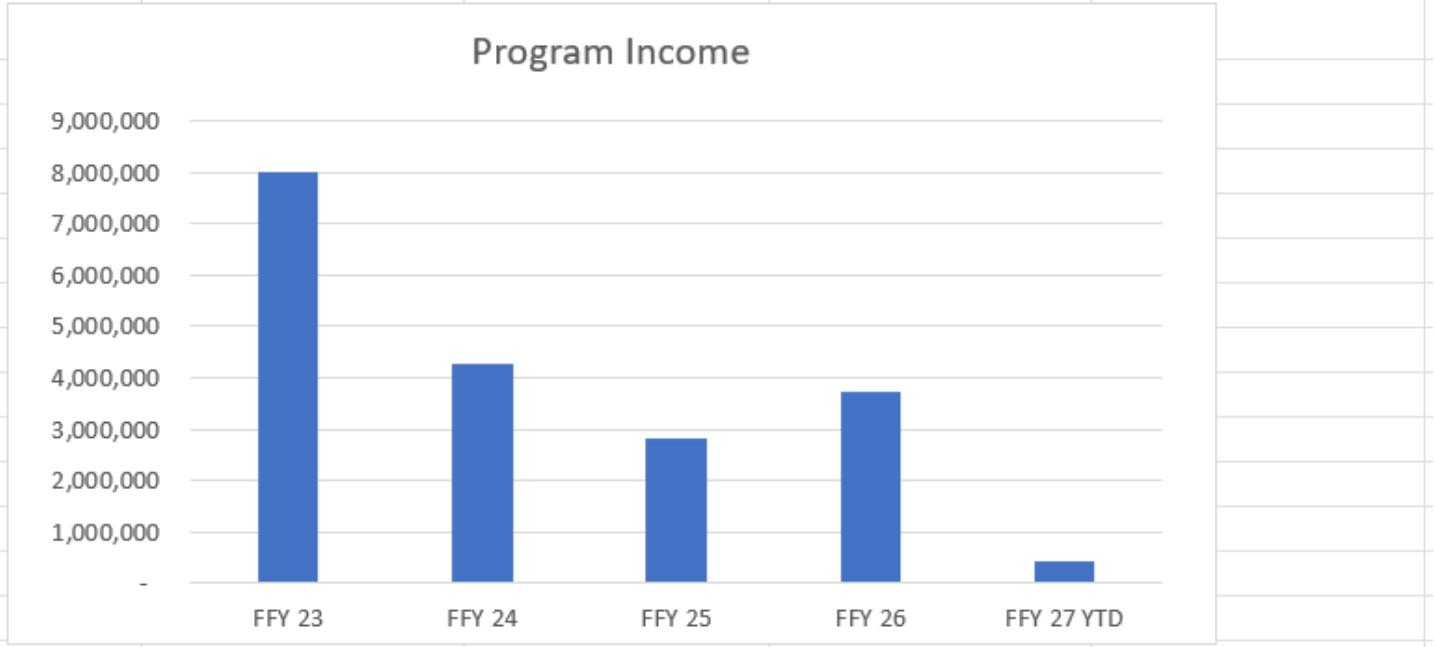
SFY 2024 – 82,577,834
SFY 2025 – 86,037,341
SFY 2026 – 78,888,983

**in SFY 26 our we went to a shared service model for our IT staff AND some of our interagency costs moved

Program Income

Program Income - Federal Fiscal Year

				10/1/2026 - 9/30/2027
FFY 23	FFY 24	FFY 25	FFY 26	FFY 27 YTD
7,999,850	4,289,222	2,832,821	3,712,936	434,301



National Conference Updates

Presented by:
Shelby Satko, Executive Director

National Conference Highlights

- National Council of State Rehabilitation Councils
- Council of State Administrators of Vocational Rehabilitation

Council Priorities

Presented by:
Jen Tabiando, Policy & Planning
Verena Strydom, Customer Satisfaction & Program Evaluation
Alex Toney, Partnership
Michele Stelovich, Executive

Policy & Planning Subcommittee

- **Priorities** –
  - Artificial Intelligence
  - Order of Selection Three Categories Project

Customer Satisfaction & Program Evaluation Subcommittee

- **Priority -** Customer Satisfaction Improvement Project

Partnership Subcommittee

Presented by: Alex Toney

-2026 Update of the -

Transition Collaborative Summative Report

A Collaborative Report

Authorized by ESSSB 5253 Legislation

Washington Office of Superintendent of PUBLIC INSTRUCTION

Washington State Rehabilitation Council

WADDC Washington State Developmental Disabilities Council

DSHS Washington State Department of Social and Health Services

Washington State Department of Services for the Blind

CCTS Center for Change in Transition Services

What is the Report?

- This report is required under Engrossed Second Substitute Senate Bill 5253 (E2SSB 5253) and due **October 2026**.
- This implementation plan must include:
  - Description of provision of coordinated transition services;
  - Examples of coordinated transition services for students ages 16–22; and
  - Assurance that transition services supplement and do not supplant special education funding
  - Consultation with nonprofit transition providers and advocates for students with IEPs

Who the Report Focuses on?

- **What we mean by Transition?**
  - Supporting students to exit school ready for their next steps after high school. This includes adult life, work, college/training and community living.

- **Who this report focuses on?**
  - Students with significant support needs. Students who are likely to be eligible for adult disability services.

- **Why this student focus group is the focus?**
  - The focus student group has the largest opportunity gaps for graduation outcomes and post school engagement.
  - Having a focus student group also supports the state to have a deep focus on data for this group.

Background

2020 Transition Summative Report

SCAN ME

Report findings informed legislative acti on, including Senate Bill 5790 which included:

- implementing interagency data share to support agency connection
- funding for School to Work expansion statewide,
- Transition Council
- creating statewide and regional transi tion network.

2026 Transition Summative Report Update

SCAN ME

Summary of Transition Support Initiatives and Activities

Key statewide efforts included:

- expansion of School-to-Work,
- implementation of a schools to disability agency data share,
- establishment of a Statewide Transition Council and strengthening of regional transition networks,
- extension of special education eligibility until age 22
- publication and systemwide use of the Washington State Transition Map
- increased emphasis on inclusive educational practices tied to post-school outcomes

Bright Spots

- **More inclusive education**
  - More students with significant support needs are learning in general education settings.

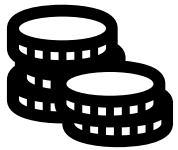
    Students in the focus group population of transition age (16–21) were included in the general education setting for 80%–100% of the day at a rate of 19.13% in 2019. By 2025, this rate increased to 28.98%, representing a **51.5% percent increase in inclusion** over the last six years.
- **Stronger coordination efforts and tools across agencies**
  - Consent-to-Share initiative helps agencies identify and support students earlier.
  - The Washington State Transition Map
- **Expanded regional coordination**
  - Regional transition networks helping partners collaborate.
  - The new state transition council
- **More employment programs**
  - School-to-Work services expanded across more counties.
  - Pre-Employment Transition Services reaching more students.

Ongoing Challenges:
Why Recommendations are Needed



- **Continued lower employment and post-school outcomes for the focus student group**
- **Transition systems don't always connect smoothly**
  - Education timelines and adult service timelines are often misaligned.
  - Students can experience a "transition cliff" when exiting school.
  - There is a need for more job readiness activities and work-based learning experiences
- **Navigation is complicated**
  - Families and educators report confusion about available services and who to contact.
- **Inconsistent experiences and access across regions**
- **Workforce and system capacity constraints**

Key Recommendations (Part 1)



- **Maintain stable funding:**
  - Maintain sustained, predictable funding for foundational transition infrastructure, particularly School-to-Work services, to ensure long-term educational and job outcomes.



- **Improve statewide alignment:**
  - Continue strengthening a consistent, statewide approach to coordinated transition planning that aligns education and adult service systems and promotes equitable implementation.



- **Clarify roles and timelines:**
  - Strengthen statewide guidance on coordinated transition timelines
  - Clarify expectations for intentional service overlap
  - Reinforce that school services and adult services overlap when needed rather than leaving gaps

Key Recommendations (Part 2)



- **Strengthen system coordination:**
  - Support cross-agency data sharing and joint professional learning
  - Regional transition networks to improve continuity, service coordination, and post-school outcomes
  - Update and streamline the experience students and families have with transition including starting services earlier to improve student employment outcomes
  - Engage business, identify barriers and improve systems to address underemployment



- **Improve system navigation:**
  - Create clearer resources so families understand available services
  - Update the Washington Transition Map
  - Enhance the Consent to Share Student Information initiative through clearer communication, family-facing resources, and strategic outreach approaches.

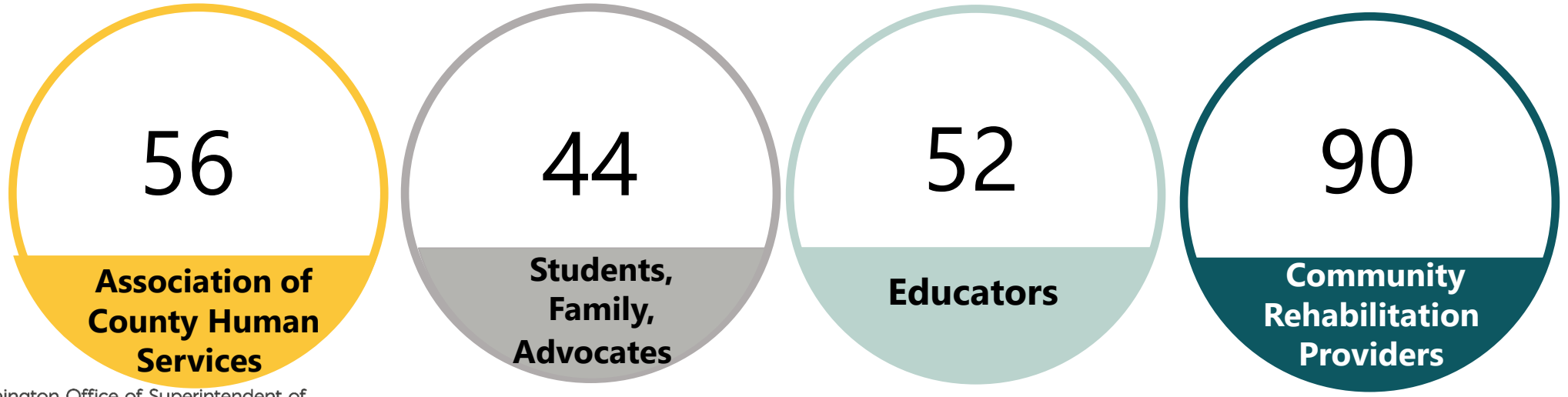
Listening Sessions-

A Joint Effort with Partners and the Community

- Five Scheduled Listening Sessions with a total of **242** Attendees



- The listening session icon is used to highlight listening session feedback and partner perspectives that help contextualize key findings, recommendations, and systems challenges.



Transition Listening Session Questions



1. Where do students or families have gaps or confusion when moving from school services to adult services?
2. What is working well and should expand statewide?
3. When or how does coordination work well? When does it break down?
4. What is one change that would improve transition outcomes the most?

Appendix F-1: Listening Sessions Summary

Table F-1-1: Primary Feedback Themes

Feedback Theme	Category	ACHS	Student Family Advocate	Educator	CRP
Inclusive education and high expectations are strongly connected to improved post-school outcomes.	Things that are working well		X	X	
Collaboration between schools, counties, DVR, DDCS/DDA, providers, and families improves outcomes when consistently implemented.	Things that are working well	X	X	X	X
Expanded work-based learning, Pre-ETS access, paid internships, and employer partnerships needed	What should be expanded	X		X	X
Need stronger statewide coordination, alignment, and consistent messaging across agencies and regions.	Recommendation	X	X	X	X
Need earlier transition outreach and planning across Birth-to-Three, preschool, middle school, and secondary settings.	Recommendation	X	X	X	X
Families need clearer guidance regarding graduation, age 22 eligibility, and continuation of transition services.	Recommendation	X	X	X	
Students with significant support needs require more individualized and flexible transition pathways and employment expectations.	Recommendation		X		X
IDD specific Employment Transition services (School to work and Job Foundations) should be housed in DDA	Recommendation	X			X
Families and students experience significant confusion navigating adult disability systems and eligibility pathways. DVR current order of selection adds further concern of delaying access to school to work services and impacting a student's progression through coordinated transition services.	Barrier	X	X	X	X
Regional inequities and rural access barriers continue to create inconsistent transition outcomes. transportation and internet access are major barriers."	Barrier	X	X		X

Table F-1-2: Secondary Feedback Themes

Feedback Theme	Category	ACHS	Student Family Advocate	Educator	CRP
Continue expanding the highly effective transition outreach strategies of transition fairs, community partnerships, peer to peer family networks and local family outreach	Things that are working well	X	X		X
Participants requested expanded inclusive postsecondary education programs and scholarship opportunities.	What should expand		X		
Participants requested more technical assistance for developing employer agreements and community partnerships.	Recommendation			X	
Participants requested post-school outcome tracking beyond one year after graduation.	Recommendation		X		
Participants stated employment-hour requirements are too rigid for some students with intensive support needs.	Recommendation		X		X
Families stated transition systems are difficult to navigate even for professionals working in special education.	Barriers		X		
Families reported confusion regarding differences between Job Foundation, School to Work, and Pre-ETS.	Barriers	X	X		X
Some districts reported resistance to inclusive work-based learning within local CTE systems.	Barriers			X	
Families expressed concern that transition information is too dependent on informal local relationships and knowledge.	Barriers		X		X
Providers stated staffing turnover across agencies disrupts continuity and coordination.	Barriers				X
Educators reported transition specialists have been reduced or eliminated because of budget constraints.	Barriers			X	

Learn more about the listening sessions and engage with the Transition Collaborative

Transition Collaborative Project

Washington Office of Superintendent of

PUBLIC INSTRUCTION

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Partnership Subcommittee

Updates

- Office of Superintendent of Public Instruction
- Workforce Training & Education Coordinating Board
- Tribal Vocational Rehabilitation
- Statewide Independent Living Council

Executive Committee

- Annual Report
- Recruitment
- 2027 Quarterly Meeting Structure & Council Engagement

Washington State
Rehabilitation Council

Additional Resources





Washington State **Transition Map**

Purpose: *The Washington State Rehabilitation Council has worked with the agencies named within this resource to support the development and publication of the Washington Transition Partnership Map. This resource aims to provide a high-level summary to assist individuals and families in learning about and connecting to transition services for which they may be eligible as students plan for their transition from high school. Additionally, it serves as a valuable tool for disability support resources and agencies to establish meaningful connections with transition services, thereby supporting individuals with disabilities in securing and maintaining employment. It is not intended to include all transition resources, many of which are available through local counties.*

	OSPI	DDA	DVR	DVR	DSB
	Office of Superintendent of Public Instruction Individualized Education Program Transition Plan	**Developmental Disabilities Administration** Job Foundation	**Division of Vocational Rehabilitation** Pre-Employment Transition Services	**Division of Vocational Rehabilitation** School-to-Work	**Department of Services for the Blind** Transition Services
Who is eligible?	All students with an Individualized Education Program will have a Transition Plan in place by age 16. Special Education is available to eligible students, pre-kindergarten until the age of 22, based on the results of a comprehensive special education evaluation done at their school.	Developmental Disabilities Administration eligible clients, age 19, enrolled in high school within a participating county.	Pre-Employment Transition Services is for students 14-21 who have a 504, an Individualized Education Program, or a documented disability. They must attend an accredited school, which includes a secondary school, General Education Development program, post-secondary, or a homeschool program.	School-to-Work is for students who live in a county that provides the program. They must be eligible for Developmental Disabilities Administration, in the last year of their transition program and of the ages 20-21.	Blind, Deaf-blind and Low Vision children, students and young adults ages birth through 21.
What does it include?	An Individualized Education Program Transition Plan includes: • Transition assessment • Appropriate and measurable post-secondary goals • Individualized transition services • Relevant course of study and annual IEP goals • Coordinated services with adult agencies	Each individual will be connected to a provider who will develop a strength based person-centered report to identify needed supports, key skills and make a meaningful connection to a job. The plan will also help individuals gather critical documents and identify important next steps for their employment goals.	Pre-Employment Transition Services program: activities on self-advocacy, work readiness, job exploration, work-based learning, and counseling on post-secondary training.	Individuals will work with an employment provider to establish a job goal, develop skills and tools for employment and then have individualized support during the transition from school to employment.	• Explorers B-13 program: activities to gain self-awareness, confidence and peer social engagement. • Pre-Employment Transition Services program: activities on self-advocacy, work readiness, job exploration, work-based learning, and counseling on post-secondary training. • Transition services: post-secondary education, vocational training, job search, supports getting and keeping a job.

WASHINGTON STATE Department of Services for the Blind
Washington Office of Superintendent of PUBLIC INSTRUCTION
Washington State Rehabilitation Council
DSHS WASHINGTON STATE Department of Social and Health Services

Most recent version and language translations of this document available at WSRCWA.org

Publication date: November 2024



Washington State **Transition Map** (continued)

	OSPI	DDA	DVR	DVR	DSB
	Office of Superintendent of Public Instruction Individualized Education Program Transition Plan	**Developmental Disabilities Administration** Job Foundation	**Division of Vocational Rehabilitation** Pre-Employment Transition Services	**Division of Vocational Rehabilitation** School-to-Work	**Department of Services for the Blind** Transition Services
How does it help individuals to get or maintain employment and continued education and training?	Special Education supports students who may be eligible through the process of developing and updating annual Individualized Education Programs. By the age of 16, this program must include a Transition Plan which outlines the support a student needs to be ready for their goals after high school. Transition Support and Services (PDF): ospi.k12.wa.us/sites/default/files/2023-12/transition-supports-svcs-summary.pdf	The goal of Job Foundation is to provide a person-centered report that connects them to the next steps for their employment. Many students continue on to receive additional support through Division of Vocational Rehabilitation and counties. Together these two programs can build a student's success for their next steps after high school.	Pre-Employment Transition Services are the earliest form of DVR services and are customized to the individual and community to support students to gain the skills necessary for first steps in employment. Services are provided in coordination with local school staff and external contractors.	School-to-Work provides individualized services to address barriers to employment for students. It will include assessment, job placement, benefits planning, and connections to long-term supports.	Department of Services for the Blind programs help children, students and young adults gain peer connections, foundational work readiness skills, and work experiences to develop a career pathway and gain employment.
How to Apply?	Learn how to reach out to your school district to start the special education referral process. **Web:** ospi.k12.wa.us/student-success/special-education/family-engagement-and-guidance/how-special-education-works	Participating counties do outreach to connect to students. **Email:** DDAHQTransition@dshs.wa.gov **Web:** informingfamilies.org/hs-jobs	Complete the Request Transition Services or Information form: dshs.wa.gov/dvr/request-transition-services-or-information. **Email:** dvrtransition@dshs.wa.gov **Web:** dshs.wa.gov/dvr/request-transition-services-or-information	**Email:** dvrschooltowork@dshs.wa.gov to find the contact for the local counties to start the application process. **Web:** dshs.wa.gov/dvr/student-and-youth-vr-transition-services	**Call:** 800-552-7103 **Email:** info@dsb.wa.gov **Web:** dsb.wa.gov/learn-about-our-services/request-more-information



Division of Vocational Rehabilitation Office Map



- REGION 1
- REGION 2
- REGION 3
- DVR Offices
- DVR co-located with WorkSource

To locate a DVR office near you:
https://www.dshs.wa.gov/dvr

To locate a WorkSource location near you:
https://www.worksourcewa.com/microsite/content.aspx?appid=MGSWAOFFLOC&pagetype=simple&seo=officelocator

DSHS
WASHINGTON STATE Department of Social and Health Services

12/25

UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES
REHABILITATION SERVICES ADMINISTRATION

Date: September 8, 2026
DCL-26-04

Dear Colleagues:

Under Secretary McMahon's leadership, the U.S. Department of Education (Department) is prioritizing students' access to demand-driven career pathways and workforce preparedness.[1] These strategies are essential for equipping all students, including those with disabilities, with the knowledge and skills necessary to thrive in a dynamic and evolving economy.

The Rehabilitation Services Administration (RSA) issues this Dear Colleague Letter (DCL) to emphasize that pre-employment transition services (pre-ETS) must be delivered in the most integrated settings as possible in accordance with section 102(b)(4)(B)(III) of the Rehabilitation Act of 1973 (Rehabilitation Act). Pre-ETS also must comply with fiscal requirements and these services, like all vocational rehabilitation (VR) services, should be customized to the unique needs of each student with a disability.

Pre-ETS Progress

In 2014, Congress passed the Workforce Innovation and Opportunity Act (WIOA) and amended the Rehabilitation Act, resulting in significant changes to the VR program. These amendments included the requirement that states reserve and expend at least 15 percent of their Federal VR allotments on the provision of pre-ETS for students with disabilities.[2]

In Program Year (PY) 2025, VR agencies provided a total of 1,879,558 pre-ETS benefiting 340,344 students with disabilities. Since WIOA data collection and reporting began in PY 2017, these figures represent the most pre-ETS provided to the largest number of students. The scope of this service delivery is an opportunity for VR agencies to positively shape postsecondary outcomes for young adults with disabilities. Twelve years after the passage of WIOA, VR programs have made significant progress in fulfilling the pre-ETS reservation and expenditure requirement. In Federal fiscal year 2024, the most recent year for which complete financial reporting is available, 52 of 56 VR programs met this requirement.[3]

[1] On April 13, 2026, the U.S. Department of Education published *Final Priority and Definitions— Secretary's Supplemental Priority and Definitions on Career Pathways and Workforce Readiness* in the Federal Register (91 FR 18780).
[2] Pre-ETS, as defined at Section 7(30) of the Rehabilitation Act, "means services provided in accordance with section 113." Section 113(a) of the Rehabilitation Act requires States to ensure they will use the funds reserved under Section 110(d)(1) of the Rehabilitation Act to provide, or arrange for the provision of, pre-ETS to students with disabilities. Section 110(d)(1) of the Rehabilitation Act establishes the 15 percent minimum reservation requirement for the State from its VR allotment. Together, Sections 7(30), 101(a)(25), 110(d)(1), and 113 of the Rehabilitation Act create the statutory basis for the State Plan provisions governing pre-ETS.
[3] The VR programs in Guam, Idaho, Kansas, and New Mexico did not meet the requirement during the reporting year.

While RSA commends VR programs for their efforts to achieve and maintain compliance with this requirement, it is equally important that VR programs also comply with all other requirements of the Rehabilitation Act, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance),[4] including ensuring all pre-ETS costs are reasonable, allocable, and necessary.

Pre-ETS Requirements

Pre-ETS must have a workforce focus and be directly related to the five required activities specified in 34 CFR § 361.48.[5] Additionally, VR agencies may provide pre-ETS on an individualized basis or in group settings customized to the individual student's needs. However, VR programs are required to report the specific services provided to each student with a disability, who is eligible or potentially eligible for the VR program.

In addition to required activities that are provided directly to students with disabilities, section 113(c) of the Rehabilitation Act permits VR agencies to carry-out authorized activities and section 113(d) the Rehabilitation Act requires VR agencies to carry out *pre-employment transition coordination* activities that support pre-ETS delivery (e.g., VR agency staff attending an IEP meeting). VR agencies may engage in *authorized* activities, which are systematic in nature, only if reserved funds remain after students with disabilities have received the *required* activities. RSA emphasizes that *required* activities, which are always direct services to students, should continue to be prioritized above *authorized* activities. While *authorized* activities are helpful in meeting the reserve requirement, RSA considers *required* activities to be the most essential for students with disabilities to explore and ultimately achieve competitive integrated employment.

Examples of Pre-ETS Delivery

<u>Compliant Examples:</u>

VR agencies have demonstrated success in providing the five pre-ETS in the community (i.e., the most integrated settings possible) in a wide array of actual employment settings. For each of the examples below, the VR agency also had adequate internal controls in place to ensure accurate reporting of pre-ETS expenditures.

1. A student with a disability participated in a paid summer work-based learning experience at a beauty salon, based on her individualized interests. The student rotated through job shadowing and on-the-job training in various positions (e.g., salon receptionist, shampoo assistant, and stylist assistant). The student interacted with clients, staff, and other stylists in training, who were not exclusively individuals with disabilities. In addition to cosmetology tasks, the student learned skills related to customer service, time management, and communication. The work experience provided exposure to the career pathway of interest and resulted in learning about employment expectations and industry-specific skills. The VR agency developed an on-the-job training agreement with the employer and reimbursed the employer for the student's wages.

[4] The Uniform Guidance is located at 2 C.F.R. Part 200.
[5] The five required activities are: job exploration counseling, work-based learning experiences, counseling on opportunities for enrollment in comprehensive transition of postsecondary education programs, workplace readiness training, and instruction in self-advocacy

2. A VR agency provided pre-ETS to students with disabilities through fee-for-service agreements with service providers and local educational agencies (LEA) statewide. These pre-ETS included paid internships, workplace readiness training (e.g., understanding employer expectations for punctuality and performance and other soft skills necessary for employment, and general financial literacy skills to budget paychecks and living expenses), and instruction in self-advocacy (e.g., peer mentoring opportunities with individuals working in their areas of interest). The VR agency provided financial literacy skills training in a group setting to students with disabilities who requested the training. Once a student expressed an interest in working, the VR agency coordinated a paid internship in a State government agency that aligned with the student's career interests.
3. A VR agency contracted with service providers to deliver peer mentoring, directly aligning with instruction in self-advocacy. In the community, peer mentors worked with students with disabilities using an approved curriculum covering disability awareness, disclosure, understanding rights and responsibilities, and decision-making. The VR agency established a cost per student per service through its rate setting methodology and reimbursed service providers upon receipt of documentation confirming delivery and fulfillment of the contract requirements.
4. An LEA provided career exploration services for a high school student with a disability interested in nursing that included a job shadowing opportunity. A VR counselor provided counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education, guiding the student through program exploration and campus tours. These tours included visits to disability support services and financial aid offices to highlight available resources. The VR agency allocated staff time spent on this pre-ETS activity to reserved funds and paid for the student's transportation to and from the activities after confirming the student's eligibility for VR services and including transportation in the student's Individualized Plan for Employment.
5. A VR agency purchased virtual reality headsets and software to provide job exploration counseling and workplace readiness training. VR staff used the headsets to help students explore careers in fields such as heavy equipment operation and electrical trades, opportunities that would otherwise be inaccessible to students due to certification requirements. Students also used the headsets to practice social skills and workplace behaviors in simulated scenarios. Because the VR agency retained the equipment and used it exclusively for pre-ETS required activities throughout its useful life, the VR agency appropriately included the cost in the pre-ETS reserve.

<u>Non-Compliant Examples:</u>

Too often, RSA has found that students with disabilities are provided the same pre-ETS – repeatedly with the same content or curriculum – resulting in a "one-size-fits-all" approach to service delivery. RSA has also identified instances where VR agencies have not provided pre-ETS in the most integrated settings possible. Examples of non-compliant pre-ETS include:

1. A VR agency organized a sports event to "promote job exploration for students with disabilities." The VR agency billed the event at a flat rate of approximately $200 per student, per hour, for 8 hours total. However, RSA found that only two of the eight hours constituted documented pre-ETS. Additionally, the VR agency claimed transportation costs for some potentially eligible students. The $200 per hour per student transportation rate exceeded the reasonable market rate for transportation costs in the area.

2. A VR agency developed a multimillion-dollar memorandum of understanding (MOU) with a community college to fund staff to provide pre-ETS to more than 1,000 students. The program was described as a six-day career transition summer program, including opportunities for hands-on career exploration, work readiness activities, and exploration of college programs and services. Although these activities are allowable pre-ETS, funds were also used for a performance by a local musician, stipends for participation in all activities, breakfast and lunch each day, and recreation activities like axe throwing. One day included visiting a water park for swimming and lunch. Though it should be noted the students learned about summer employment opportunities at the water park, VR funds should have only been used for costs associated directly with the provision of pre-ETS.
3. A VR agency paid a provider to function as the employer of record for potentially eligible students, develop pre-ETS plans/reports, and provide "necessary work experience supports." The provider paid students an hourly wage and fringe benefits for the duration of an eight-week summer work experience. None of the students with disabilities had approved individualized plans for employment (IPE) that reflect short-term job coaching services, and there were no service authorizations for any support services for the duration of the work experience. The lack of actual services on approved IPEs and the absence of service authorizations impeded the VR agency's ability to capture and report the VR services supporting the pre-ETS. The development of plans/reports is not pre-ETS or VR services.
4. A VR agency arranged for a student with a disability to participate in a "summer camp" where the student worked in a non-integrated setting because the student interacted exclusively with individuals with disabilities. While the student earned an hourly wage, the work environment was segregated and the tasks replicated those carried out in adult sheltered employment.
5. A VR agency developed an arrangement with a LEA to fund staff to teach a "transition-school-to work (TSW)" class to potentially eligible students. The class covered job exploration counseling, workplace readiness training, and instruction in self-advocacy. The same three pre-ETS were provided repetitively, regardless of students' areas of interest or needs. The documentation submitted by the TSW teachers to the VR agency had limited information to document the pre-ETS provided. TSW staff were not required to track, document or report actual time spent providing Pre-ETS versus other transition-related activities within their roles (e.g., teaching other classes, coaching sports, or performing other school duties).

Order of Selection

Currently, in PY 2026, 17 VR agencies are operating under an order of selection (OOS), and nine of these agencies have all priority categories closed. Despite the allowability of implementing an OOS for cost containment purposes, under section 101(a)(5)(A) of the Rehabilitation Act, the pre-ETS reserve and expenditure requirement still applies. Section 113 of the Act requires VR agencies to make pre-ETS available statewide to all students with disabilities regardless of whether the student has applied or been determined eligible for VR services. As such, VR agencies are required to provide pre-ETS statewide regardless of whether the VR agency is operating under an OOS.

Conclusion

RSA will continue to monitor the pre-ETS fiscal and program requirements via annual reviews and periodic on-site monitoring, as required by section 107 of the Rehabilitation Act, to support

compliant and high-quality pre-ETS and other VR services that prepare young adults with disabilities for high-growth, high-wage, and high-demand careers in accordance with Secretary McMahon's priority.

VR agencies are encouraged to contact their RSA State Team before initiating or changing pre-ETS service delivery. In addition, RSA recommends that VR agencies seek technical assistance (TA) from its two TA centers:

- National Vocational Rehabilitation Technical Assistance Center; and
- National Technical Assistance Center on Transition

If you have any questions regarding this DCL, please contact Ed Vitelli at Edward.Vitelli@ed.gov. On behalf of the Department, thank you for your partnership and ensuring the VR program fully leverages this opportunity to provide meaningful and impactful pre-ETS to students with disabilities.

Sincerely,

Christopher Pope
Director, State Monitoring and Program Improvement Division, delegated the authority to perform the functions and duties of the Commissioner

WSRC Commonly Used Acronyms

ACS: American Community Survey (from the Census Bureau)
ADA: Americans with Disabilities Act
AFP: Authorization for Payment
AJC: American Job Center
ALTSA: Aging and Long-Term Support Administration
ASL: American Sign Language
AT: Assistive Technology
ATAP: Assistive Technology & Assessment Practitioner
BASC: Barriers and Accessibility Solutions Committee
BHA: Behavioral Health Administration
BLS: Bureau of Labor Statistics (Census of Employment and Wages)
BMMP: Business Management Modernization Project

CAP: Client Assistance Program
CARF: Commission on Accreditation of Rehabilitation Facilities
CART: Computer-assisted real-time Translation
CCER: Center for Continuing Education in Rehabilitation
CFR: Code of Federal Regulations
CIL: Center for Independent Living
CMS: Case Management System
CRP: Community Rehabilitation Provider
CP: Cerebral Palsy
CRC: Certified Rehabilitation Counselor
CSNA: Comprehensive Statewide Needs Assessment

DD: Developmental Disability
DDA: Developmental Disability Administration
DES: Department of Enterprise Services
DSB: Department of Services for the Blind
DSE or DSU: Designated State Entity or Designated State Unit
DVR: Division of Vocational Rehabilitation

EDI: Equity, Diversity, and Inclusion
ESD: Educational Service District, also, Employment Security Department

FCS: Functional Community Supports
FFY: Federal Fiscal Year

ID: Intellectual Disability
IDEA: Individuals with Disabilities Education Act
IEP: Individual Education Plan
IL: Independent Living

IRI: Institute on Rehabilitation Issues

JLARC: Joint Legislative Audit and Review Committee (Report on Employment and Community Inclusion Services for People with Developmental Disabilities)

LRE: Least Restrictive Environment
LTS: Long Term Support

MH: Mental Health
MOU: Memorandum of Understanding

OFM: Office of Financial Management
OJT: On-the-job Training
OSERS: Office of Special Education and Rehabilitation Services
OOS: Order of Selection
One-Stop: WorkSource Center
OSPI: Office of the Superintendent of Public Instruction

PAVE: Partnership for Actions Voices for Empowerment (Parent Advocacy)

RCW: Revised Code of Washington
RDA: Research and Data Analysis (research division of DSHS)
Region 10: Federal Region of Washington, per RSA
RFP/RFQ: Request for Proposal/Qualifications
RSA: Rehabilitation Services Administration

SILC: State Independent Living Council
SIPP: Survey of Income and Program Participation (Census Bureau)
SPIL: State Plan for Independent Living
SME: Subject Matter Expert
SSA: Social Security Administration
SSDI: Social Security Disability Insurance
SSI: Supplemental Security Income

TAP: Talent and Prosperity for All Plan
TBI: Traumatic Brain Injury
TSAT: Transition Self-Assessment Tool
Title 4: of WIOA is the Rehabilitation Act,
Title 1: under Title 4, which authorizes DVR services and funds
Section 105 of Title 1: authorizes State Rehabilitation Councils

UI: Unemployment Insurance

VR: Vocational Rehabilitation
VRC: Vocational Rehabilitation Counselor

WAC – Washington Administrative Code

WATAP: Washington Technical Assistance Program
WIOA: Workforce Innovation and Opportunity Act
WISE: Washington Initiative for Supported Employment
WOTC: Work Opportunity Tax Credit
WTECB: Workforce Training, Education, and Coordination Board
WSRC: Washington State Rehabilitation Council
WDC: Workforce Development Council
WOTC: Work Opportunity Tax Credit

WA DVR

AFP: Authorization for Purchase
CBA: Community Based Assessment
JD: Job Development
ELT: Executive Leadership Team
IPE: Individual Plan for Employment
IRWE: Impairment Related Work Expense
ITS: Intensive Training Services
MOU: Memorandum of Understanding
MSD: Most Significantly Disabled
NEO: New Employee Orientation
Pass Plan: Plan to achieve self-support
Pre-ETS: Pre-Employment Services
PES: Post-Employment Services
PHI: Protected Health Information
RA: Regional Administrator or Re
RCD – Rehab Counselors for the Deaf
Region 1: East of the Cascades
Region 2: King County north
Region 3: Pierce County south and all of the peninsula
ROI: Release of Information
RT: Rehabilitation Tech
SDOP: Service Delivery Outcome Plan
SDOR: Service Delivery Outcome Report
SE: Supported Employment
SO: State Office – DVR Headquarters
SOP: Standard Operating Procedure
STARS: DVRs customer database
TWE: Trial Work Experience
YSP: Youth Services Program
121 Program: Tribal Rehabilitation Program (Federal designation)
701 Program: Tribal Rehabilitation Program (WA State designation)