Pre- Employment Transition Services (Pre-ETS) Program Guidebook for Local Education Agencies (LEAs)

Disability:IN North Carolina | InRoads to Employment
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Forward

This guidebook was developed by Disability:IN North Carolina under a grant from the NC Council on Developmental Disabilities (NCCDD). The guidebook is a product of InRoads to Employment initiative which began on March 1, 2018 and ended on February 28, 2021. InRoads to Employment was designed to showcase innovative strategies for expanding employment opportunities for individuals with disabilities in North Carolina, with a special emphasis on youth with developmental disabilities. InRoads to Employment focused on three major outcomes including 1) developing a model for two pilot paid apprenticeships, 2) assisting two school systems to develop Pre-Employment Transition Services (Pre-ETS). and 3) creating a postsecondary mentoring program. Each of these three model programs were detailed in individual guidebooks that are distributed by the North Carolina Council on Developmental Disabilities to encourage replication of these

Disability:IN North Carolina is the only private non-profit, business to business network devoted to disability employment inclusion in the workforce, supply chain and marketplace. Founded in 2012, DI-NC’s mission is to empower businesses to achieve disability inclusion and equality. We serve NC employers through Business Networking, Education and Training, Consultation and Support and Sourcing Opportunities that diversify both their talent pipeline and vendor list to include individuals and entrepreneurs with disabilities. Our strength comes from our business members and sponsors across NC committed to creating disability inclusive corporate cultures. Our members are ranked among the best places to work for disability inclusion in NC.

Beth Butler, Executive Director, Disability:IN North Carolina
strategies. The guidebooks are also available for download on Disability:IN North Carolina’s website at: www.di-nc.org.

Disability:IN North Carolina (DI-NC) included the development of Pre-ETS services, focused on the role of local school systems because DI-NC staff had experience in developing a Pre-ETS program with the Carrboro Chapel Hill School system in 2017. DI-NC is in a unique position as a thought-leader in disability employment and inclusion due to our network of member employers and our business connections in the disability inclusion space. This guidebook will illuminate the following implementation insights on Pre-ETS services.

1. Give a brief overview of Pre-ETS services and discuss the technical support provided by DI-NC to write the proposal with Cleveland County Schools (CCS).
2. Provide detail on the development of READY, the Cleveland County School system’s (CCS) Pre-ETS program.
3. Discuss the emerging best practices in the delivery of Pre-ETS services.
4. Present the CCS student outcomes of the first two years of implementation in terms of services provided, number of student’s served, student demographics and student satisfaction with the services received via their participation in READY.

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Purpose of this Guidebook

In 2014, the Workforce Innovations Opportunity ACT (WIOA) increased transition services for students with disabilities to by requiring Vocational Rehabilitation agencies to commit 15% of their general budget to Pre-Employment Transition Services (Pre-ETS). In the years since 2014, states across the nation have issued Requests for Applications (RFAs) for community rehabilitation programs, independent living centers, schools, parent centers and other non-profit agencies with experience in transition services to apply for grant contracts to deliver Pre-ETS services. Some states have utilized vocational rehabilitation staff, called vocational instructors to implement Pre-ETS (e.g., Utah). The Resources section of this guidebook provides a list of other guides and white papers that are focused on the development of Pre-ETS with CRPs as the lead agency. Local Education Agencies (LEAs) or school systems are also eligible to apply to provide Pre-ETS services. In North Carolina (and in other states), the
The majority of Pre-ETS services are being delivered by community rehabilitation programs (CRPs), while fewer Pre-ETS programs are being administered by independent living centers, parent education centers and other non-profit organizations.

There are compelling reasons to support LEAs (local school systems) to apply for Pre-ETS grants as the administrative lead agency. Schools systems can access student schedules, leverage additional school resources (transportation, technology, transition staff) and scale Pre-ETS programs to support larger numbers of students than most CRPs are able to manage. This guidebook is designed to provide a general overview of Pre-ETS services in North Carolina with a focus on encouraging local school systems to consider developing Pre-ETS services as the administering lead for these programs. The guide also provides information on how CRPs and other agencies that administer Pre-ETS services can encourage LEAs to take a more active role in collaborating with other lead agencies in the delivery of Pre-ETS services.

**Brief Overview of Pre-ETS services**

The Rehabilitation Act as amended by the Workforce Innovations Opportunity Act (WOIA) of 2014 expanded the ability of vocational rehabilitation agencies to offer more types of transition services to secondary students with disabilities (ages 14-21). By 2016, most states completed their state requirements to invite organizations to apply for Pre-ETS service awards. Pre-Employment Transition Services (Pre-ETS) were designed to give students with disabilities an earlier start at job exploration, career planning and post-secondary counseling to enhance their ability to gain competitive integrated work directly after high school, or after graduation from college and/or technical training. The goals of WIOA align with the Individuals with Disabilities Education Act (IDEA) as well as with Employment First Initiatives. (Transcen, 2019).

**Organizational Standards**

Organizations who wish to apply to North Carolina Division of Vocational Rehabilitation (NCDVR) to provide Pre-ETS services must meet minimum qualifications including:

1. Propose a minimum of two of the five Pre-ETS Required Activities,
2. Demonstrate that the organization’s staff have three or more years of related experiences in the specific area of pre-employment transition services for which the Applicant is applying,
3. Be registered as a business in the state of NC by the NC Secretary of State,
4. Provide evidence that the organization conducts criminal background checks and manages abnormalities in a manner consistent with that outlined in the RACRP,
5. Provide a Program Budget for the proposed program, and
6. Provide the organization’s most recent audited financial statement.

**Additional information on the North Carolina Division of Vocational NCDVR Pre-ETS Requests for Applications (RFA) is available at:** Pre-ETS Request for Applications for Community Rehabilitation Partnership (RACRP) #967
The Rehabilitation Act also expanded the population of students with disabilities who may receive Pre-ETS services from just students who were deemed eligible for VR services, to include students who are considered potentially eligible for VR services in the future. This means that students who have not yet applied for or been made eligible for VR services, can receive Pre-ETS services during secondary school.

**Early evidence indicates that state VR agencies are providing these services through a mix of direct service provision by VR staff, contracts with community rehabilitation providers, and contracts with other entities such as high schools, community colleges, teachers, and social workers (Miller, Sevak, & Honeycutt, 2017).**

Presented below are the five required activities that are defined as Pre-ETS services (NCDHHS, 2020). Agencies applying for grant contracts are instructed to select at least two or more (up to five) required activities to include in their program designs. Following the five required activities there are defined objectives that align with each Pre-ETS Intervention. For each required activity, an organization proposes to deliver, there must be at least one associated Pre-ETS Service Objective aligned with that activity.

**STUDENT ELIGIBILITY FOR PRE-ETS SERVICES**

An individual with a disability in a secondary, post-secondary, or other recognized education program who is aged 14-21 years and is (1) eligible for and receiving special education or related services under Part B of the Individuals with Disabilities Education Act (IDEA) or (2) is a student who is an individual with a disability for the purposes of section 504 of the Rehabilitation Act (34 CFR §361.5(c)(51)). A post-secondary or other recognized education program must result in a recognized post-secondary education credential (RSA-TAC-17-01) (NCDHHS, 2020).
## PRE-ETS Required Services

<table>
<thead>
<tr>
<th>Pre-ETS Required Activity Type</th>
<th>Pre-ETS Service Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>A. Job Exploration Counseling</strong></td>
<td>1A Explore career options and identify career pathways of interest</td>
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<td></td>
<td>2A Uncover vocational interests using inventories</td>
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<td></td>
<td>3A Learn about new skills needed in the workplace and for specific jobs</td>
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<td></td>
<td>4A Understand the labor market including in demand industries and occupations</td>
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<td></td>
<td>5A Learn about non-traditional employment options</td>
</tr>
<tr>
<td><strong>B. Work-Based Learning Experiences</strong></td>
<td>1B Develop work skills through participation in paid and nonpaid work experiences in community integrated employment</td>
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<tr>
<td></td>
<td>2B Apply classroom knowledge to the workplace</td>
</tr>
<tr>
<td></td>
<td>3B Gain greater understanding of the soft skills important to success in the workplace</td>
</tr>
<tr>
<td></td>
<td>4B Learn from people currently practicing in the occupations and careers of interest to the student</td>
</tr>
<tr>
<td><strong>C. Counseling on Post-Secondary Training Options</strong></td>
<td>1C Gain greater understanding of types of post-secondary training available to prepare the student for the workplace</td>
</tr>
<tr>
<td></td>
<td>2C Increase awareness of financial resources for funding post-secondary education</td>
</tr>
<tr>
<td></td>
<td>3C Understand the role of disability support services and other resources to promote student success in the post-secondary education setting</td>
</tr>
<tr>
<td><strong>D. Workplace Readiness Training</strong></td>
<td>1D Develop communication and interpersonal skills required to interact with supervisors and coworkers in the workplace</td>
</tr>
<tr>
<td></td>
<td>2D Develop self-management and independent living skills required to engage in post-secondary education and/or employment (e.g., punctuality,</td>
</tr>
</tbody>
</table>
### Table of Skills Development

<table>
<thead>
<tr>
<th>3D</th>
<th>Improve knowledge of accessing community supports and managing resources (financial literacy)</th>
</tr>
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<tbody>
<tr>
<td>4D</td>
<td>Gaining knowledge of job seeking skills</td>
</tr>
<tr>
<td>5D</td>
<td>Develop orientation and mobility skills that allow the student to better access the community for participation in postsecondary education or employment opportunities</td>
</tr>
</tbody>
</table>

#### E. Instruction in Self-Advocacy

| 1E  | Develop student’s knowledge of self                                                           |
| 2E  | Improve student’s knowledge of rights and responsibilities, including requesting disability-related accommodations in the education setting or workplace |
| 3E  | Develop student’s communication skills for asserting his/her own interests and desires         |
| 4E  | Build the student’s leadership skills                                                         |

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**Collaboration with Other Adult Services Systems and Post-Secondary Programs**

To be successful, Pre-ETS services are highly dependent upon building collaborative partnerships across multiple partner organizations. Regardless of whether the lead agency is a CRP, independent living center, parent information center, other non-profit or a school system, all these agencies will need to partner with each other and coordinate with local vocational rehabilitation unit offices in each community where Pre-ETS services are implemented to support students with disabilities to achieve their individual transition goals.

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“When students with disabilities access collaborative services during high school, they are more likely to experience positive post-school outcomes” *(Noonan, 2013) (Test, 2009).*
There are three main types of collaborative partnerships that occur for the purposes of transition planning (Noonan P.-E. A., 2013).

1. Community-level teams that link schools, a district or multiple districts in the community
2. School-level teams support the transition planning efforts for all students in the school
3. Individual-level teams support the transition needs of individual students.

The following tables describe the different team levels in a collaborative structure, their purpose, participants and primary activities (Transcen, 2019).

1. **Community Level Team**

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Participants</th>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Collaboration among schools (elementary, middle, high), VR, CRPs and other local agencies, employers, parents</td>
<td>School District Administration</td>
<td>Coordinate and align local resources to provide integrated employment experiences</td>
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<tr>
<td></td>
<td>Special Education administrators and teachers</td>
<td></td>
</tr>
<tr>
<td></td>
<td>School Counselors</td>
<td>Identify and address community needs related to student skill development and CIE after HS graduation</td>
</tr>
<tr>
<td></td>
<td>Vocational Rehabilitation Counselors</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Career Technical Education</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Employers</td>
<td>Understand local business needs and engage employers to provide work experiences and employment for young adults with disabilities</td>
</tr>
<tr>
<td></td>
<td>Workforce (DOL)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Parents</td>
<td></td>
</tr>
<tr>
<td></td>
<td>CRPs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Post-Secondary Education/ Training</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mental Health</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Others specific to the Community</td>
<td>Provide opportunities for personnel and parents to learn about</td>
</tr>
</tbody>
</table>
EBPs of transition and CIE for students with disabilities.

2. School-Level Teams

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Participants</th>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Collaboration across school curriculum and programs to address skill/career development for students with disabilities</td>
<td>School Administration, Teachers (Special and Gen education, CTE), School Counselors, VR Counselors, CRP’s, Parents, Students, Others specific to the school</td>
<td>Partner with VR Counselors and other community members in the provision of career development and community-based work experiences</td>
</tr>
<tr>
<td>Collect and analyze student data to identify and address areas of need</td>
<td></td>
<td>Align curriculum and programs vertically across grade levels and content areas.</td>
</tr>
<tr>
<td>Create opportunities for family engagement and learning</td>
<td></td>
<td>Structured communication and intervention regarding student needs.</td>
</tr>
</tbody>
</table>
### 3. Individual Student Level Teams

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Participants</th>
<th>Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coordinate provision of individualized services and supports in both school and community settings</td>
<td>Student</td>
<td>Identification of student career interests and needs</td>
</tr>
<tr>
<td>Develop and carry out a plan based on student identified career goals beyond high school</td>
<td>School Administrator</td>
<td>Development of plan with outcome-oriented goals and activities.</td>
</tr>
<tr>
<td>Engage and communicate on a regular basis with family regarding student needs and progress</td>
<td>Student’s teachers (Special and General education)</td>
<td>Academic and employment skills development</td>
</tr>
<tr>
<td></td>
<td>VR Counselor</td>
<td>Coordinated series of community-based work experiences, including paid work</td>
</tr>
<tr>
<td></td>
<td>School Counselor</td>
<td>Regular communication with family about student progress and needs</td>
</tr>
<tr>
<td></td>
<td>Family</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Others specific to student needs (i.e., CRP, probation)</td>
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</tbody>
</table>

In summary, organizations that propose to deliver Pre-ETS services need to consider their existing capacity to offer these services as well as their unique role as a partner with other agencies that will be their local collaborators. Specifically, organizations need to consider the following questions as they determine their ability to deliver a successful Pre-ETS program of services.

1. How will providing Pre-ETS services align with the mission of the organization?
2. What are the needs of the local NCDVR unit office with respect to Pre-ETS services?
3. Does your organization have a working relationship with NCDVR and with the local school system and managed care organization (MCO) to partner to assure Pre-ETS services are successful?
4. Does your organization have the capacity, fiscal capacity and technical ability to expand to provide Pre-ETS?
5. Can your organization hire skilled staff (leadership and instructors) to deliver and monitor the Pre-ETS services to secondary students with disabilities?
6. Should your organization be the administrative lead for the LEA, or another non-profit agency has greater capacity to administer the program with your organization assuming a sub-contract through a partnership agreement.

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**PLANNING FOR PRE-ETS SERVICES**  
*(TRANSCEN, 2019)*

<table>
<thead>
<tr>
<th>Which partner agency or organization on the team has the following:</th>
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<tbody>
<tr>
<td>• Connections to business</td>
</tr>
<tr>
<td>• Identification of Community Resources</td>
</tr>
<tr>
<td>• Setting up community-based services</td>
</tr>
</tbody>
</table>

**How is the school system currently offering the following courses?**

<table>
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<tr>
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<tbody>
<tr>
<td>• Teaching employability classes</td>
</tr>
<tr>
<td>• Connections to business</td>
</tr>
<tr>
<td>• Developing work-based learning opportunities</td>
</tr>
<tr>
<td>• Teaching self-advocacy skills</td>
</tr>
<tr>
<td>• Activities related to post-secondary education</td>
</tr>
</tbody>
</table>

**What are the roles and responsibilities of each partner agency in delivering the following services and where are the gaps that Pre-ETS services may address?**

<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td>• Career exploration activities</td>
</tr>
<tr>
<td>• Job placement</td>
</tr>
<tr>
<td>• Work readiness training</td>
</tr>
<tr>
<td>• Teaching self-advocacy skills</td>
</tr>
<tr>
<td>• Activities related to post-secondary education</td>
</tr>
</tbody>
</table>
Funding Pre-ETS Services

Extensive planning is needed to develop the programmatic aspects of a Pre-ETS program and define the roles of collaborating partner agencies to assure the success of the program. Knowledge and experience with how NCDVR funds pre-ETS services is critical to building a sustainable Pre-ETS program. While school systems are the experts in educational instruction, often LEAs are not aware of the differences in funding systems used by government agencies such as vocational rehabilitation. Furthermore, it can be daunting for an LEA to consider becoming the administrative leadership for a Pre-ETS program because the difference in funding models between the schools and Pre-ETS services is not well understood by the LEA leadership. The following information will clarify 1) how Pre-ETS services are funded, 2) provide strategies for how LEAs can develop fiscal systems to mitigate the risk of outcome-based funding, 3) achieve a sustainable program that covers all the costs of the total program, and 4) add considerable value for the students with disabilities served by the LEA while leveraging and enhancing existing current transitions services offered by the LEA.

LEAs that have not done business with Vocational Rehabilitation will find that the funding systems are very different from how schools are funded. Though Pre-ETS funding is called a “grant” the way funds are dispersed are very different from most grants. NCDVR funds agencies to provide Pre-ETS services under an outcome-based funding system based on milestone payments. NCDVR is not able to provide any upfront start-up capital (they do not make any lump sum payments to help agencies start their Pre-ETS services). In a purely outcome-based funding model, the agency providing the services would only get paid at the end point, after all services are delivered. (For example: Payment for a student to attend a self-advocacy class for one semester (4 months) could mean a lapse in payment to the agency providing the Pre-ETS services of several months after the student completed the semester before payment would be made.)

In a milestone-based funding system, student progress is tracked at regular intervals during the semester, and invoices are submitted when the student completes pre-determined activities or

How LEAs Are Funded in North Carolina

Managing the fiscal operation of LEAs across the state is built around managing the allotments each LEA receives from the legislature for general operations (the largest expenditure is for teachers and administrative staff) LEAS also receive local funds, appropriated by their county commissions, for building, equipping, and maintaining school facilities and can also supplement state school operating expenses. Usually, the local funds are committed by the county board of commissioners by the first of July each year. The state allotments are determined by the “head count” of students on the tenth day of a new school year. This means that by the tenth day schools are assured of the amount of funds they will receive from the legislature for each school year, and that they can draw down these funds as needed throughout the year.
projects during the semester. Using a milestone payment system, helps the agency administering the Pre-ETS program receive smaller payments throughout the semester, instead of having to wait until the student completes the entire semester to get paid. Pre-ETS service providers partner with NCDVR to decide the criteria by which milestone deliverables will be met by each student and documentation is required to assure that the criteria for successful completion of each milestone is met. Documentation can include assessment reports, progress notes, attendance records, work samples, pre and post-tests as well as student outputs such as

**Milestone Payment:** A per-student unit of billable Pre-ETS services proposed by the Applicant in which a defined set of deliverables are successfully achieved and subsequently paid at an agreed-upon rate.

completed worksheets, resumes, job applications, career profiles and portfolios and student presentations. If a student needs a scribe to document their responses, the scribe’s help is noted in the documentation.

Once each milestone is completed, the organization that is administering the Pre-ETS services must give an invoice for each student and each milestone completed (along with the supporting documentation) to the local NCDVR office, who will review the documentation and forward the invoice to the state office in Raleigh for reimbursement. Reimbursements for Pre-ETS services are not based on time spent in providing the services and reimbursements are not issued for partial completion of a milestone deliverable.

**Administrative Burden and Risk Management**

Milestone payments ease the cash flow challenges for agencies providing Pre-ETS services. Even large organizations may find it difficult to fund a Pre-ETS program if they had to wait for six months or longer to receive payment for the services. However, the tradeoff for easing cash flow is a substantial increase in invoices that must be submitted throughout the funding cycle. Likewise, tracking the supporting documentation for each student as they complete milestones and providing sufficient documentation to the local NCDVR staff is no small feat. The sheer number of documents that must be tracked is substantial as illustrated below.

**For example:** A Pre-ETS program serving 50 students, each of whom are enrolled in 2 Pre-ETS services per semester = 100 outcomes, however if milestone payments are made at 4 intervals in the semester= 400 invoices would be needed (along with the approved supporting documentation on each student) to receive all the payments associated with the 50 students.
NCDVR request agencies to submit invoices on a monthly basis, for students as they achieve individual milestones. Pre-ETS agencies must also maintain separate case records for each student that are available for NCDVR to review upon request. Agencies may use electronic formats so long as the information is encrypted and kept on secure servers accessed by password-protected devices for which access is limited to persons for whom the student/student’s representative has granted consent. Student case records must be made available to the Division(s) upon request.

Managing the administrative burden of keeping track of all the milestone payment requirements requires agencies that deliver Pre-ETS services to have dedicated fiscal tracking systems, and in many cases a dedicated bookkeeper to process invoices and track reimbursements in a prompt and accurate manner. Many organizations use electronic data base systems to manage the administrative burden and manage the risk of missing payments under a milestone payment system.

**Setting Milestone Payments**

Another way that agencies manage the risk of missing payments is to base the number of milestones at a lower number than the total students to be served by figuring out a “benchmark number” based on comparisons to previous student demographics. This way, the actual payments of each milestone are based on a higher rate per milestone and are therefore more achievable. In the example below the costs are simplified.

**For example:** The cost to provide a self-advocacy course for 20 students for one semester is $10,000 ( $10,000/20 students = $500 per student.) The milestones are set for 2 payments of $250 each to be paid when each

**BENCHMARK NUMBERS**

The benchmark number is the number of students (after accounting for potential who do not complete the program) a Pre-ETS program can serve and realistically achieve their funding targets to cover the budget. Simply stated, the LEA compares the number of students that were served last year in each EC program category, reviews the number of students who moved or did not complete the programs for other reasons, and estimates the benchmark number to use in setting the number of students to serve in each milestone. Setting the benchmark number of students per each milestone becomes more accurate (and risk is reduced) as the program continues year over year and there is more data to inform the decision-making process.

**insert text box; Milestone: a per-student unit of billable Pre-ETS services proposed by the Applicant in which a defined set of deliverables are successfully achieved and subsequently paid at an agreed-upon rate.**
student completes ½ of the course requirements (250x 2 milestones each X 20 students=40 milestone payment for a total of 20 students). However, the agency needs to consider that not all 20 students may complete all the milestones. Some students may get sick and not complete all the course work required. Other students may move out of the district before the milestones are completed. Instead of basing the milestone payments on all 20 students, the agency bases the payments on 15 students (managing the risk that as many as 5 students may not complete the course). Now the payments = $10,000 (total cost for the course) /15 students= $667 per each of 15 students divided in 2 payments of $334.00 per milestone ( $333.33 X 2 milestone payments X 15 students who complete all the milestones= $10,000.). Note that 20 students will still be served, however, invoices for services will only be paid out for 15 students.

It is important to understand that NCDVR meets with every agency that is offered a grant for Pre-ETS services to negotiate the total grant award and to review and agree on the benchmark numbers and milestone payments that will help the agency manage their risk. However, each agency that applies for Pre-ETS grants needs to understand how to determine their benchmark numbers of students served, determine the milestone payment systems and determine the management systems that are needed that will work for them.

The Case for School Systems to Lead Pre-ETS programs

As previously stated, successful Pre-ETS programs require deep collaboration with the local school system and multiple partner organizations including community rehabilitation programs (CRPs), independent living center, parent information centers. All these agencies also need to coordinate with local vocational rehabilitation unit offices in each community where Pre-ETS services are implemented to support students with disabilities to achieve their individual transition goals. Typically, the local CRP is the administrative host for Pre-ETS services however, there are compelling reasons for school systems to consider their opportunity to become the lead administrator for a Pre-ETS program instead of handing over the administrative responsibilities to another partner agency. Local School systems bring certain advantages to the administration of Pre-ETS services that other partner agencies are not able to deliver. Chief among these is that local school systems have greater access to the student population and more control over course schedules for individual students. Local school systems are also able to leverage other school resources and align the curriculum used in their programs for students with disabilities to enable greater student participation in Pre-ETS services. These advantages can result in larger numbers of student’s served by Pre-ETS programs with school systems as the administrative lead agency.
Access to Students to Schedule Pre-ETS Services

A typical high school manages large numbers of students, who are enrolled in 6-7 periods of required courses daily via a complex web of changing schedules and extra curricula activities. The logistics of managing all these people and moving parts requires schools to plan well ahead of each semester (whenever possible) to enable all students to meet their course requirements during the three years of secondary school attendance (or more for students with disabilities who choose to attend secondary school to age 22.)

The space available for classroom instruction in most LEAs is limited, often due to delays in funding for expansion of buildings and classroom space that does not keep pace with the growth of student population. If classroom space is already allocated, CRP’s and other agencies that administer Pre-ETS programs have to find space outside the high school and also secure transportation for the students to attend their Pre-ETS services away for the school grounds.

The school principal is the chief administrator who oversees the daily functions of a high school. He/she manages the staff that choreograph the complex schedules for all students. It is not easy to reschedule courses or alter content delivered in certain classes without the support of the principal as well as support from the LEAs central administrative leadership (including the Exceptional Children’s Department of the LEA). Often, when outside agencies such as CRPs or other non-profits try to implement programming such as Pre-ETS, they are met with resistance to or limited access to students and the time needed in the school schedule, to deliver Pre-ETS services. Some CRPs have had to reduce the number of students served in their Pre-ETS programs when the LEA they were working with was unable or unwilling to alter course schedules and/or allow the CRP staff to deliver their training as part of other course content along side of the LEAs teachers. Though CRPs and other non-profits can deliver Pre-ETS services after school, on weekends and/or during summer break, this limits the time available to work with students with disabilities who most need more job exploration services to make a successful transition from school to work. Access to the students, and the ability to advocate for flexible schedules is easier if the Pre-ETS services are administered by the LEA and the buy-in among the leadership (principals, Exceptional Children’s Department and administrative staff at the central office) is orchestrated from within the LEA.
Leveraging School Resources

When outside agencies lead the administration of Pre-ETS services, and access to the school location is limited, they must rely on public transportation or invest in vans or other vehicles to transport students to the location where Pre-ETS courses are offered. In North Carolina, the two public schools that administer Pre-ETS programs, Carrboro-Chapel Hill School System (CHSS) and Cleveland County Schools (CCS), were able to arrange for yellow school busses (and sometimes, leased vehicles) to transport students to and from off-campus work-based experiences. Likewise, both CCHS and CCS were able to align the content delivered in the FRC, OCS and extended content standards with the content of the Pre-ETS learnings. This provides a way to reinforce and repeat the content for students.

Overcoming Barriers and Challenges

The case is strong for encouraging school systems to assume leadership positions in developing Pre-ETS partnerships. However, there are some challenges and barriers to this approach, largely due to the differences in administrative structures and funding between LEAs, CRPs, and other non-profits. The chief barrier is the differences in how vocational rehabilitation funds programs versus how school systems are funded. However, with technical support, many school systems can learn to administer Pre-ETS programs while achieving greater scale to serve more students than most CRPs or other non-profit agencies are able to serve.

Funding general school operations is the responsibility of The State of North Carolina. N.C. General Statutes 115C-408 states that it is the state’s responsibility to fund the operational instructional expenses from state revenues. The same statute (N.C. General Statute 115C-B) stipulates that North Carolina counties are responsible for building, equipping and maintaining school facilities and can also supplement state school operating expenses.

“North Carolina spends almost 40% of the state budget on public education, more than any other expenditure(i) In fiscal year 2018-19, $13.9 billion (statistical profile) was spent on K-12 public schools, 9.1 billion of that total was money appropriated by the state government. (Luebke, 2020)”
North Carolina is one of only a handful of states that uses what is called a resource allocation model to distribute funding to local districts, which then distribute funding to schools via dollar allotments. Allotments are formulas that use specific criteria to distribute money to ensure that districts are treated fairly and that they also meet the differing needs of school districts across the state. Most of the time this funding is distributed to LEAs (including lab schools and charter schools) in North Carolina. The state also distributes funds to educate specific populations such as special needs or at-risk students and provides support to districts with specific challenges such as small size or low wealth. Instead of funding specific programs, the state allotment of funds creates a pool of funds from which the LEA can deliver a range of services. Unfortunately, this funding model can make it difficult to promote the development of innovative programs such as Pre-ETS due to the need to present these ideas to a host of managers, committees, and board members inside and outside the schools to gain approval for new models of service delivery.

As previously described, one way to overcome this barrier is for an LEA to use outside grants, which may be administered by a foundation associated with the LEA to administer the Pre-ETS funds and provide fiscal and programmatic oversight for the Pre-ETS program.

As discussed in the overview of Pre-ETS funding, NCDVR cannot provide any upfront funds to cover the expenses of the Pre-ETS program until milestone payments begin to be reimbursed and LEAs are not experienced with milestone payment systems. Pre-ETS is funded via milestone-payments that are dispersed only after invoices are received. However, there are other ways for LEAs to secure the startup funds to enable them to become the administrative lead agency for a Pre-ETS programs program. Leveraging other grants can make it possible for an LEA to manage the reimbursement gaps without incurring considerable debt until a steady flow of reimbursements eases the cash flow gap. Using one or a combination of these strategies enabled Carrboro Chapel Hill School System (CCHS) and Cleveland County Schools (CCSO to manage their financial risk while assuming the administrative lead for their Pre-ETS programs.

School finance officers say their biggest challenge is working with limited funds and within the strict limitations that the state and federal governments place on how districts spend money. The point of those limitations is to ensure that school districts spend money on an intended use, such as using the funds designated for students with disabilities only on those students. School finance officers say the downside of the lack of flexibility is that it keeps them form doing innovative things with their money, to support the needs and strengths of their own district (Debruyyn, 2018).
Funding the Upfront Costs of Pre-ETS Services.

1. School systems may seek foundation (or corporate) grants (from locally based foundations and/or from internal/school related foundations) to be the fiscal agent for the Pre-ETS program.

2. School systems can start their Pre-ETS program more gradually at a smaller scale and add high schools and expand services to more students over time as the milestone payments become more consistent and stable. Both CCHS and CCS scaled their program growth in part to manage the financial risk.

3. School systems can seek out a CRP or other non-profit to partner more extensively and share the program costs between the LEA and CRP. Carrboro-Chapel Hill Schools split the cost for their Pre-ETS program with TEACCH (their partner CRP) via a subcontract agreement. TEACCH was willing to seek reimbursement for their subcontracted expenses after the CCHSS foundation began receiving milestone payments from NCDVR.

Technical Support from Disability:IN North Carolina

Through the InRoads to Employment Initiative, Disability:IN North Carolina was able to provide technical support to assist the Cleveland County School system (CCS) to develop their Pre-ETS program proposal. DI-NC assisted staff from the CCS to 1) research their capacity to develop Pre-ETS services, 2) identify the students and schools for their pilot program, 3) write the program proposal, 3) develop the program budget and 4) develop a model to scale the program to all their other high schools once the pilot year was completed. In addition, DI-NC assisted CCS during the program and budget negotiations with NCDVR. The case study presented below outlines how the CCS Pre-ETS program was developed and presents information on the impact of the program on student’s who were served.
Case Study: Cleveland County Schools Pre-ETS Services

Cleveland County Schools (CCS) was founded via the 2004 merger of the Kings Mountain City Schools, Shelby City Schools, and the former Cleveland County Schools. CCS offers the following programs for students with disabilities.

**Future Core Ready**: The Future Ready Core (FRC) program is designed for students with disabilities who are on track to earn a High School Diploma. All public high school students must meet minimum state graduation requirements (at least 22 credits) to earn a diploma and graduate. The Future-Ready Course graduation requirements ensure that a student is prepared for life and whatever pathway they choose after they graduate, workplace, colleges/university, or the military.

**Occupational Course of Study (OCS)**: of career training. The Occupational Course of Study is designed to provide eligible students as determined by the IEP Team, the skills needed to develop a foundation for work. This course of study consists of three components: (1) **standards-based curriculum**, (2) **job training**, and (3) **competitive work experiences**. The Future-Ready Occupational Course of Study (FR- OCS) is intended to meet the needs of a small group of students with disabilities who need a modified curriculum that focuses on post-school employment and independent living. The OCS is a modified standard course of study consisting of fifteen courses in English, mathematics, science, occupational preparation, and social studies. Students must also complete career/technical education credits, healthful living and electives needed to complete graduation requirements. Each student must complete 300 hours of school-based vocational training, 240 hours of community-based training and 360 of hours paid employment and produce a career portfolio documenting completion of course of study requirements.

*The total school enrollment in 2019 was 14,796 students, making Cleveland County Schools the 25th largest LEA in North Carolina.*
Extended Content Standards: This course of study was designed for the small part of students with significant cognitive disabilities who may continue to attend secondary school until age 22. The Extended Content Standards are based on the grade level standards of NC Standard Course of Study, with more emphasis on functional skills and objectives. Students enrolled in the Extended Content Standards program receive a Graduation Certificate at the time of high school exit, and do not receive a high school diploma.

ConneXions: At 18, some students with intellectual disabilities choose to continue their education through the ConneXions program located at the community college to age 22. The Project Discovery and MECA curricula that are used at ConneXions for career training are limited. Students from higher incidence disability groups have no career related training other than what is offered through Career Technical Education (CTE) courses.

CCS Past Performance in Transition Services

In 1994 Cleveland County was awarded a NC Systems Change Transition grant. The work of this grant resulted in the creation and implementation of a locally sanctioned Occupational Course of Study (OCS) which was used as the model for the state OCS implemented statewide in 2000. Staff in Cleveland County also worked with UNC Charlotte on a federal dissemination grant to help other states implement the OCS. Another program, CIRCLES (Communicating Interagency Relationships and Collaborative Linkages for Exceptional Students), was also initially created and implemented in Cleveland County and eventually developed into a federal grant resulting in multiple NC school systems implementing the interagency transition planning model. Eight years ago, Cleveland County schools collaborated with Cleveland Community College to establish ConneXions, a postsecondary program for students who after completing the academic portion of the Occupational Course of Study and Extended Content Standards desired more training with a vocational focus. In 2015, collaboration with the Agencies of Jenny Carrington resulted in ConneXions Achieve for young adults with significant intellectual disabilities. Most recently, the EC Department of Cleveland County Schools was a designated site for the implementation of the Road to Learning and Earning grant overseen by Western Carolina University. This grant focused on the transition resources, interagency collaboration, and curriculum development. At this present time, Cleveland County Schools is serving as a site for the Roads to Learning and Earning: Preparing Personnel to Improve Post-School Outcomes for Students with Significant Disabilities federal grant project received by Western Carolina University. Finally, from 2005 – 2017 several secondary teachers have received 6+ NC-DCDT grants to improve/enhance transition services. (Dr. Nellie Aspel, 2018)
Reaching Employment and Developing Youth (READY)

In collaboration with Disability:IN North Carolina, through the InRoads to Employment Initiative, staff from the Exceptional Children’s Department at CCS began meeting in spring, 2018 to develop a Request of Applications (RFA) for a Pre-ETS program proposal. DI-NC provided technical assistance to help CCS align their existing transition services with the new course content and vocational exploration services outlined under Pre-ETS. DI-NC staff also helped CCS to understand the milestone funding system that is used to fund Pre-ETS services. Specifically, DI-NC assisted CCS to determine a budget for the program, align the Pre-ETS services to projected costs and use past outcome data on student demographics to set a benchmark rate and milestone payment for each of the Pre-ETS services that CCS proposed to deliver if their RFA was awarded a contract from NCDVR. The technical support provided by DI-NC began with weekly meetings to develop the RFA and continued through the contract negotiation period with monthly meetings. After the award, DI-NC continued to provide consulting and technical support to CCS on an as needed basis to help them launch their program, achieve steady cash flow from their reimbursements for Pre-ETS services and adjust to changes that were caused by the pandemic restrictions in 2020.

Cleveland County Schools (CCS) developed the Reaching Employment and Developing Youth (READY) Pre-ETS program to establish a system-wide transition curriculum of pre-employment training services. The CCS Exceptional Children’s (EC) department was already providing some vocational training to the OCS and extended content students through their occupational preparation classes well before the Pre-ETS proposal was developed. CCS has also employed transition assistants (TAs) and exceptional children’s (EC) teachers who have been providing a limited amount of job exploration experiences via short term internships and job shadowing. The READY program was needed to expand and enhance all elements of transition services offered, especially to focus on the intense job exploration training that many of the OCS students need to enter careers while students are enrolled in CCS.

Implementing the First Phase of the READY Program

CCS submitted their proposal to North Carolina Division of Vocational Rehabilitation in May 2018 and was notified that the READY program was approved for funding August 2018. However, as is customary, NCDVR needed to negotiate the final terms of the Pre-ETS contract before the program could set an official start date. The negotiation period enabled CCS to carefully review all the elements of the proposed scope of work and review the proposed budget and align the rate setting and milestone payments with other expenditures which were added to the final budget. During negotiation, CCS added a line item to the budget to hire a part time bookkeeper so that the CCS finance staff would be able to assume the extra burden of processing all the milestone invoices that the READY program generated. CCS also expanded
the travel budget to reimburse the school system for more transportation costs related to work-based internships proposed in the scope of work. Throughout the negotiation period DI-NC provided technical support to aid in the decision-making process.

In early Fall, 2018, one of the CCS Transition Specialists retired. The position that opened due to this retirement gave CCS the opportunity to hire the Program Coordinator, Dr. Jennifer Wall before the READY program’s official start date on January 1, 2019. Having Dr. Wall in place ahead of the start date meant that she could become familiar with the READY program requirements and could form working relationships with CCS system staff (principals, teachers, administrative support staff, transportation staff, etc.). Initially Dr. Wall filled an open position that was funded through the ConneXions program. In addition to her responsibilities in the ConneXions program, Dr. Wall also used this time to further develop partnerships with both the local NCDVR office and with staff at Partners Behavioral Healthcare (the Local Management Entity/Managed Care Organization) in preparation for when the READY program was launched in early 2019.

The READY program was designed to be implemented in a phased approach. Starting on January 1, 2019 CCS implemented the program at three schools (Kings Mountain High, Burns High and North Shelby School) and in the Cleveland County Community College for students with disabilities who continue secondary school via the ConneXions program to age 22. Once the program was launched, Dr. Wall became the full time Director of READY and CCS filled the position she vacated at ConneXions with another professional instructor.

On January 1, 2019, the READY Program was launched under a six-month contract with NCDVR (January 1, 2019 to July 31, 2019). A second contract (Phase 2) for 12 months was in effect from July 1, 2019 to June 30, 2020. Phase 3 of the CCS READY program is currently under a 12-month contract with NCDVR (July 1, 2020 to June 30, 2021). Currently, the READY program has expanded to serve all 5 high schools as well as two alternative schools and the ConnXections program at community college.

**Pre-ETS Services: READY Program Design**

_Ready_ Employment and _Developing_ Youth (READY) established a comprehensive program to assist every student identified in the target population cited above to gain the transferable employment skills needed to achieve competitive employment and/or post-secondary education outcomes. READY provides all five of the pre-employment transition services (PETS) including (1) job exploration counseling, (2) work-based learning experiences including in-school or after school opportunities, or experience outside of the traditional school setting (including internships), (3) counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education; (4) workplace readiness training to develop social skills and independent living; and (5) instruction in self-advocacy, including peer mentoring.
Job Exploration Counseling:
When students enter the READY program, staff assist each student in completing one or more of the assessments listed below, to gather valid and reliable information to inform each student’s transition component of their IEP. All PETS services are delivered in alignment with the vocational goals and transition plans outlined in each student’s Individual Education Plan (IEP) and (for student’s receiving VR services) with their Individual Plan for Employment (IPE). The type of assessment used is selected based on the student’s ability level and mode of communication. The READY career coaches, administer and track the assessments described below, unless licensed teaching staff perform a specific assessment.

READY Assessment Tools that CCS uses are listed below (and are also listed in the Resources Section of this guidebook).

1. O*Net (to assess interest and ability),
2. SAMs (Skills Assessment Module)
3. TAGG (Transition Assessment Goal Generator)
4. YES Interest Inventory

Instruction in Self-Advocacy: Students who are in their junior year of high school take part in two self-advocacy lessons per week during their OCS block (or for FRC students in small group or individualized instruction sessions). The READY career coaches teach the self-advocacy courses at the CSS high schools and the ConneXions program. As students enter their senior year in high school, their career coaches also provide many opportunities to apply and practice their self-advocacy skills during work readiness training and work-based learning experiences at local businesses that host internships for the READY program. As previously stated, when the pandemic interrupted face-to-face Self-Advocacy instruction, CCS established virtual lessons that the career coaches conducted in small groups online. Students are able to complete the required milestones at their own pace and ability because the lessons are tailored to each student’s capabilities.

Workplace Readiness (101 and 201): Beginning in the senior year READY students participate (in person or virtually) in workplace readiness classes focused on developing their social skills, communication and interpersonal skills, financial literacy, orientation and mobility skills, and job-seeking skills. Students have opportunities to apply the “soft skills” (employer expectations for punctuality and effective work performance, etc.) through engaging in school-based work experiences (in the school office, student store, cafeteria, athletic department, maintenance department, etc.) Workplace readiness instruction lessons and activities help to inform the job and career choices that students will make as they prepare to enter work-based learning opportunities in the second half of their senior year (for FCR students) or during their tenure in the ConneXtions program (for OCS students who are enrolled until age 22). Students in the ConneXtions program are often the most challenged students who need more intensive instruction and that is delivered over an extended time frame. For ConneXtions students READY provides two sessions work readiness 101 and 201 in order to enable them to reach their
potential. Work readiness instruction is provided to all Seniors in OCS, FCR and the students enrolled in extended content curriculum throughout the year in individual lessons and small groups at their own pace and ability.

**Work-Based Learning Experiences:** Work-based learning experiences are unpaid internships designed to enable students to master a variety of transferable work skills, with training support provided by the READY career coaches. Beginning the Senior Year (for OCS and FCR students) up to 4 work-based experiences can be offered for at least 10 hours duration at a host business. OCS students may engage in four to six different work-based experiences (totaling 6 weeks duration for each work experience) from age 18 to 22 to when the ConneXions program ends. Future Core Ready (FCR) students who have IEPs but are due to graduate with a diploma at the end of their senior year, engage in two or more work based experiences in a six-week duration during third and final grading period. CSS provides yellow school buses as well as access to the use of fleet cars, owned by CCS to transport students to work-based learning experiences. As previously described the COVID-19 requirements to social distance interrupted and/or restricted the number and variety of work-based experiences that CCS was able to offer among local employers in Cleveland County during 2020. Prior to COVID-19 the READY coordinator, curriculum specialist, and career coaches had established a number of host employer internship sites where students participated in work-based learning experiences. Once the pandemic restrictions end, CCS anticipates re-establishing their network of work experience sites.

**Career Counseling:** The READY provides students with career counseling to enable students to make informed decisions about enrolling in comprehensive transition or postsecondary educational programs at institutions of higher education. The READY team focuses on helping every student to understand and improve their knowledge of post-secondary training options and their relationship to employment opportunities. During career counseling, juniors meet with the READY Coordinator who reviews their first assessments to establish their career goals and later supports them as seniors to implement their post-secondary goals. For students who will graduate with diplomas, the READY Coordinator collaborates with high school guidance counselors to assure that students receive information and assistance to apply for college, technical training programs or enlist in the military branch of their choice. Students entering employment are referred to vocational rehabilitation services (for those eligible for VR services) as well as to adult employment services that provide work adjustment job coaching or supported employment services. Career counseling is also provided to Seniors serviced in the OCS and FCR programs to provide students with post-secondary plans for transition to employment, enlistment or enrollment in community colleges, universities and/or technical training after graduation. Students in the ConneXions program participate in career counseling in their final year of enrollment in ConneXions at age 21-22.
Roles of the Community Partners

The CCS Exceptional Children’s department staff works closely with the local vocational rehabilitation (VR) unit office. CCS collaborated with all the community rehabilitation partner (CRP) agencies in Cleveland County, especially during transition planning for exiting secondary students. There is a strong Transition Interagency Team that meets 8 times a year. Cleveland County also has a cooperative agreement with Cleveland County Technical Community College (CCTC) which hosts the ConneXions program.

READY Staff roles and function -
READY staff roles and job descriptions are described below. READY staff members work in collaboration and coordination with the existing Cleveland County Schools Transition Coordinator to expand our district’s ability to provide meaningful work readiness training to our EC students. The collaborative nature of the partnership ensures easy access to students during the school day. Key READY staff have access to CSS fleet cars or yellow school busses to transport students to work based learning experiences and are required to hold or obtain a NC bus license in order to utilize the yellow school bus for transporting students to community sites for employment training or job placement activities.

READY Coordinator (100% FTE). The READY Coordinator provides oversight and supervision of the PETS services to ensure that all students receive the services that meet their individual needs. The READY Coordinator assures that all READY partners achieve goals on time and that outcomes are met. The READY Coordinator monitors the billing process to ensure that regular invoices are submitted to NCDVR as milestones are achieved and that invoices are paid promptly. Together with the Curriculum specialist, the READY Coordinator provides the post-secondary career counseling services for students (who are bound for college or technical training following graduation) and represents READY to the business community to secure the host sites for work experience training internships. CCS hired Dr. Jennifer Wall who has extensive experience in post-secondary vocational and educational preparation for students with disabilities. Dr. Wall worked as an OCS teacher, worked with NSTTAC as a graduate student, and was the Director of the Think College program at Winthrop College. Dr. Wall has 13 years of experience working with secondary students in transition and job coaching.

Curriculum Specialist (100% FTE) In 2020, CCS hired Haley Blanton, M.Ed., as the full time Curriculum specialist for the READY Program. The curriculum specialist helps the READY coordinator with curriculum development, logistics and data collection. Ms. Blanton develops curriculum and writes lesson plans for job seeking skills and job readiness skills. She also directs the career coaches in the delivery of services. Ms. Blanton is an expert in working in transition, job coaching and lesson plan development. She helps with developing work experience sites with local businesses and with coordination of referrals to adult service agencies to secure paid jobs for students after graduation.
**READY Career Coaches (100% FTE)** CCS is budgeted for a total of 6 fulltime Career coaches. Career coaches are assigned to each of the target high schools and the ConneXions program. The budget for Career coaches was based on someone highly qualified (Associates Degree or 48 hours of post-secondary education credits) with 3 years of experience working with individuals with disabilities. All career coaches are required to obtain a NC bus license in order to utilize the yellow school bus for transporting students to community sites for employment training or job placement activities. Career coaches perform the job exploration counseling services and help each student to identify their vocational goals. Career coaches deliver the self-advocacy training and work readiness training services in class and small group or individualized lessons based on the needs of each student they also provide the on-the-job training support for students engaged in work experience training with local businesses.

**Student Demographics and Performance Outcomes**

Approximately 60 students (ages 16-22) participated in at least one of the transition services through the READY program between January 1, 2019 and June 30, 2019. From August 19 to December 2020 a total of 269 (a growth of over 44%) students were enrolled in one or more of the READY services.

**August 1, 2019 to December 31, 2020 Student 2020 demographics**

<table>
<thead>
<tr>
<th>Disability Category</th>
<th>Number of Students</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADHD</td>
<td></td>
</tr>
<tr>
<td>Intellectual Disability-Severe</td>
<td></td>
</tr>
<tr>
<td>MU-Multiple Disability</td>
<td></td>
</tr>
<tr>
<td>Reading Disorder</td>
<td></td>
</tr>
<tr>
<td>SLD-Specific Learning Disability</td>
<td></td>
</tr>
<tr>
<td>AU-Autism</td>
<td></td>
</tr>
<tr>
<td>Learning Disorder NOS</td>
<td></td>
</tr>
<tr>
<td>OHI-Other Health Impairment</td>
<td></td>
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<tr>
<td>Seizure Disorder</td>
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<tr>
<td>ID-Intellectual Disability</td>
<td></td>
</tr>
<tr>
<td>Mood Disorder NOS</td>
<td></td>
</tr>
<tr>
<td>OI-Orthopedic Impairment</td>
<td></td>
</tr>
<tr>
<td>SED-Serious Emotional Disorder</td>
<td></td>
</tr>
<tr>
<td>TBI-Traumatic Brain Injury</td>
<td></td>
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<tr>
<td>VI-Vision Impairment, Blindness</td>
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</tbody>
</table>
Student Satisfaction Surveys of READY Program

Surveys were conducted with a sample of students in June 2019. Students were also surveyed in December 2020. A comparison of the student satisfaction surveys for 2019 and 2020 are presented in Attachment A for each of the survey questions. Below are highlights of the results of student satisfaction surveys.
Recommendations for LEAs Considering Pre-ETS Programs

This guidebook was designed to make the case for more LEAs (local school systems) to apply for Pre-ETS grants as the administrative lead agency. As the administrative lead, LEAs can improve 1) access to larger numbers of students and the ability to scale up to serve the entire school district, 2) the support from school principals and other LEA administrators to change student schedules to deliver Pre-ETS services more efficiently, 3) LEAs are the experts in curricula and in transition services, 4) schools can leverage other school resources (transportation, technology, transition staff). The barriers for LEAs to assume administrative leadership of a Pre-ETS program are largely due to the challenges associated with learning to operate under a milestone payment system and managing the financial risk of not achieving sufficient milestones to cover the costs of the Pre-ETS program.

CCS has operated the READY Program since January 1, 2019 by earning 100% of the milestone payments budgeted for the program. Furthermore, CCS was able to earn more reimbursements beyond their original budget due to serving more students than they originally set in their benchmark budget.

Emerging Best Practices

Listed below are the emerging best practices that DI-NC and CCS identified through the READY program. As previously stated, Pre-ETS services are a relatively new program and research is lacking on evidence based best practices for the delivery of Pre-ETS. These are offered as recommendations for other LEAs to consider as they evaluate how to partner with other

✓ 51% of students reported that they were better prepared to transition from high school to college after taking part in the READY program.

✓ 49% reported that they were definitely better prepared to self-advocate after taking self-advocacy training through the READY program.

✓ 33% of students felt that the READY program helped them decide to pursue post-secondary training or college after high school.
organizations to develop and implement Pre-ETS services. Though the majority of Pre-ETS programs are currently being administered by CRPs or other non-profit agencies (who partner from the outside) with LEAs, the recommendations presented below are offered to encourage more LEAs to consider the benefits of partnering with local agencies as the administrative lead for the Pre-ETS program.

Engaged and Committed Leadership

CCS was fortunate in that the Director of Exceptional Children’s (EC) programs, Dr. Nellie Aspel had held the position since 2009. Prior to becoming the EC Director, Dr. Aspel was the principal for North Shelby School (since 1987), an alternative k-12 school for children with significant cognitive and multiple disabilities for over 33 years. Dr. Aspel was well known, well liked and highly respected by her Superintendent, Dr. Stephen Fisher and his administrative staff and principals who were early champions of her efforts to secure funding for the READY program. Nevertheless, throughout the launch and early months of the READY program Dr. Aspel, Dr. Wall and the entire READY team kept the CCS administration aware of the program’s operation and briefed them on challenges in a timely manner. One of the challenges of significant concern to the administration was managing the potential risk of fiscal instability posed by any lapse in milestone payments. Disability:IN North Carolina provided technical support on demand, to assist the READY staff to stay on top of the invoices, reimbursements and manage the programmatic documentation, throughout the program’s first year of operation.

Ability to Leverage Additional Funds and Manage Cash Flow

The past performance clearly demonstrates that CCS has been very successful in securing grants and additional resources via interagency agreements and memorandums of agreement (MOAS) with various local agencies and entities. Having administered many past grant programs CCS leadership understands that grants are temporary and do not create a sustainable program. Pre-ETS services are not a grant in the traditional sense (there are no upfront cash awards). PRE-ETS services are funded under contracts based on a fee for service milestone payment system. School systems can expect to cover the cost of the program for at least 3 to 6 months (or more) before invoices are processed and paid back to the school system on a regular cycle. Having a fund balance, or the ability to tap into local foundation funding is absolutely essential to cover the gaps in cash flow that milestone funding creates. Prior to submitting the Pre-ETS RFA, it was determined that EC Department of Cleveland County Schools had a sufficient fund balance to front the cost of salaries for some personnel to start some aspects of the program before the launch date (January 1, 2019). After the launch date CCS budgeted from its fund balance to cover transportation costs and essential supply costs until these costs were covered via milestone reimbursements, some 3 to 6 months after NCDVR invoices were submitted. CCS also made sure to stagger expenditures, purchasing only essential services or items, until NCDVR invoices were on a regular cycle of reimbursement.
Manage Expenditures and Scale the Growth of the Program

It is important for other school systems to recognize that there are other costs not included in delivery of the Pre-ETS services (e.g., school buses used to take students to job sites, student Chromebooks, cost of internet, etc.) that will need to be covered upfront by the school system until milestone payment reimbursements are collected. As stated above, managing expenditures by only making necessary purchases (delaying others until invoices are paid) was one strategy that CCS used to buffer the of cash flow gaps. Another strategy CCS used was to start Pre-ETS services in only a few schools (3 high schools) during the first year, to manage total costs and cash flow. CCS has been intentional about scaling the program of services by adding a few more high schools. Currently the READY program is offered in all 5 high schools, the ConneXions program (located at the Cleveland County Community College) and the alternate schools in Cleveland County service students with disabilities in grades 9 to 12 +.

Qualified Staff

Collectively, CCS staff (i.e., teachers and transition specialists) had between one and 34 years of experience providing pre-employment and transition services when they applied for the Pre-ETS grant. As detailed previously, CCS was also well known as respected for being an innovator in transition services and for attracting and keeping top talent. The leadership of the CCS’s Exceptional Children’s Department (especially under the direction of Dr. Nellie Aspel)* was key to their success in building and delivering one of the largest, and most successful Pre-ETS programs in North Carolina. CCS was able to hire, train and supervise qualified career coaches who worked in tandem with the transition teams as each of the high schools to support individual students.

Dedicated Bookkeeper & Electronic Monitoring Systems

School systems that are already struggling to deliver educational services on limited budgets for both instructional and administrative staff. It is vital to include dedicated staff and electronic billing and data management systems to manage the billing and keep track of the documentation reports required by NCDVR. Even programs led by CRPs or other non-profits find the volume of administrative work demands additional staff to manage. CCS was fortunate to hire a retired bookkeeper on a part time basis to manage their invoices. As a result, CCS drew down the entire amount of their projected budgets since they began providing Pre-ETS services.

Flexibility in Scheduling, Instructional Grouping and Teaching Modalities

Because CCS was the administrative lead for the READY program, the program had support from the Superintendent’s office and buy-in from the high school principals such that it was
able to make schedule changes for individual and groups of students. Once the pandemic caused schools to close in March 2020, CCS permitted the READY program staff to shift over to online instruction for self-advocacy, work-based readiness instruction, and post-secondary counseling services. Even before the pandemic, CCS READY staff were adept at shifting to individual instruction or small group instruction to accommodate the schedules and learning needs of individual students with disabilities. Having the school system as the administrative lead, enabled greater flexibility than would have been possible for an outside agency to demonstrate because the READY program was supported by the Superintendent and high school principals.

**Braided Funding Across Partner Agencies**

Through READY, the school district had been braiding the resources and services of Cleveland County Schools and Cleveland Community College even before the READY program began. The foundation of the present ConneXions program was based on the existing collaboration and coordination with Cleveland Community College and Agencies of Jenny Carrington. The CCS Exceptional Children’s department staff had been working closely with the local vocational rehabilitation (VR) unit office well before the READY program was launched. The local VR unit office has been instrumental to the success of READY and continues to be a key partner in the program. Likewise, CCS collaborates with all the community rehabilitation partner (CRP) agencies in Cleveland County, especially during transition planning for our exiting secondary students. There is a strong Transition Interagency Team that meets 8 times a year. We also have a cooperative agreement with Cleveland County Technical Community College which hosts our ConneXions program. As CCS scales up the READY program to serve all high schools in 2021, CCS plans to contract with local CRPs to expand the work experience training services to enable a seamless bridge to ongoing job placement services for many more of their students.

**Strong Partnership with the Local Office of NCDVR**

CCS has a well-established working relationship with the Cleveland County Vocational Rehabilitation Unit office which helped to inform and support the development of the READY program. NCDVR can provide services such as supported employment, work adjustment job coaching and even traditional job placement will be needed by many students after graduation from high school. In addition, students with disabilities who can enter technical school, community colleges and universities, may benefit from a referral to VR. The success of the READY Pre-ETS program was forged by the strong partnership with NCDR.

**Cultivate a Partnership with the Local Management Entity - Managed Care Organization (LME-MCO).**

In addition to partnering with NCDVR, CCS cultivated a strong partnership with Partners Behavioral Health, the Local Management Entity - Managed Care Organization (LME-MCO).
partnering with the LME-MCO enabled CCS to assist students with significant disabilities to access the Innovations Waiver, Medicaid B#3 services, and state funded adult services that provide wrap around services (residential, respite, community engagement, rehabilitation, etc.) for eligible students after they leave secondary school.

**Conclusion**

The information presented in this guide will assist LEAs to make more informed decisions about how they can structure and manage Pre-ETS services to benefit the students they serve. There are many compelling reasons for LEAs to consider designing Pre-ETS services with the LEA as the administrative lead. The guide also provides information on how CRPs and other agencies that administer Pre-ETS services can encourage LEAs to take a more active role in collaborating with other lead agencies in the delivery of Pre-ETS services. Whether or not the LEA oversees administering the programs, the information about how Pre-ETS programs operate and the example of how CCS is implementing the READY program will assist LEAs to partner more effectively with CRPs or other non-profits to build and deliver successful Pre-ETS programs for secondary students with disabilities across the state.
Resources

General Information and Assessments for Pre-ETS Programs

- Disability:IN North Carolina, DI-NC.org for technical support and consultation regarding Pre-ETS services and program development
- North Carolina Division of Vocational Rehabilitation, (NCDVR) Pre-ETS Requests for Applications (RFA) is available: [Pre-ETS Request for Applications for Community Rehabilitation Partnership (RACRP) #967](http://www.transitiontoemployment.org/toolkit.html)
- SAMs (Skills Assessment Module) [Skill Assessment Modules (SAMs) for TABE 9 & 10 (mheducation.com)](http://vr.nebraska.gov/resources/pdfs/TR_Educators_Guide.pdf)
- TAGG (Transition Assessment Goal Generator) [Zarrow Center TAGG (ou.edu)](http://www.transitiontoemployment.org/toolkit.html)
- WINTAC Pre-ETS FAQs ([http://www.wintac.org/topic-areas/pre-employment-transition-services/faqs#fas-main](http://www.wintac.org/topic-areas/pre-employment-transition-services/faqs#fas-main))
- WINTAC Pre-Employment Transition Services Implementation Checklist ([http://www.wintac.org/topic-areas/pre-employment-transition-services/resources/pre-ets-implementation-checklist](http://www.wintac.org/topic-areas/pre-employment-transition-services/resources/pre-ets-implementation-checklist))

Job exploration counseling

- O*Net Career Exploration Tools ([https://www.onetcenter.org/tools.html](https://www.onetcenter.org/tools.html)). The O*NET Program is the nation’s primary source of occupational information. It provides set of self-directed career exploration/assessment tools to help students who are exploring school-to-work transition in planning career options.
- Opening Doors to Employment ([https://dpi.wi.gov/sites/default/files/imce/ sped/pdf/tranopndrs-employmt.pdf](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/tranopndrs-employmt.pdf)) is a handbook created to provide guidance to youth, parents, school counselors, special educators and others involved in transition from school to work. Includes templates and tools to use with youth.
• Workforce Innovation Technical Assistance Center (WINTAC) ([http://www.wintac.org/topic-areas/pre-employment-transition-services/overview/job-exploration-counseling](http://www.wintac.org/topic-areas/pre-employment-transition-services/overview/job-exploration-counseling)) provides guidance on Job Exploration Counseling.

Post-Secondary Counseling

• ACT - Services for Students with Disabilities ([http://www.act.org/content/act/en/products-and-services/the-act/registration/accommodations.html](http://www.act.org/content/act/en/products-and-services/the-act/registration/accommodations.html)) ACT has established policies regarding documentation of an applicant’s disability and the process for requesting accommodations.

• Opening Doors to Post-Secondary Education & Training ([https://dpi.wi.gov/sites/default/files/imce/sped/pdf/tranopndrs.pdf](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/tranopndrs.pdf)) this handbook was created to assist students, parents, special educators, guidance counselors and others to assist students in transitioning to postsecondary education and training opportunities.

• Workforce Innovation Technical Assistance Center (WINTAC) ([http://www.wintac.org/topic-areas/pre-employment-transition-services/overview/counseling-opportunities-enrollment](http://www.wintac.org/topic-areas/pre-employment-transition-services/overview/counseling-opportunities-enrollment)) provides an overview of Post-Secondary Counseling activities.

Self-advocacy instruction

• I’m Determined: Empowering self-determination behavior ([https://www.imdetermined.org/](https://www.imdetermined.org/))

• I’m Determined project, a state-directed project funded by the Virginia Department of Education, focuses on providing direct instruction, models, and opportunities to practice skills associated with self-determined behavior.

• Job Accommodation Network ([https://askjan.org/](https://askjan.org/)) provides information about accommodations in the workplace.


• The 411 on Disability Disclosure: A Workbook for Youth with Disabilities ([http://www.ncwd-youth.info/411-on-disability-disclosure](http://www.ncwd-youth.info/411-on-disability-disclosure)) is a workbook for youth and adults working with them, designed to assist in making informed
decisions about whether or not to disclose their disability and how that decision can impact their education, employment, and social lives.

- Zarrow Center for Learning Enrichment. ([https://www.ou.edu/education/partnerships/zarrow](https://www.ou.edu/education/partnerships/zarrow)) A wealth of resources and curriculum for teaching self-determination skills, including self-advocacy.

**Work based learning experiences**

- Workforce Innovation Technical Assistance Center (WINTAC) ([http://www.wintac.org/topic-areas/pre-employment-transition-services/overview/work-based-learning-experiences](http://www.wintac.org/topic-areas/pre-employment-transition-services/overview/work-based-learning-experiences)) offers guidance on work-based learning experiences.

**Workplace readiness training**

- Life Centered Education (LCE) ([https://www.cec.sped.org/Publications/LCE-Transition-Curriculum/Benefits-of-Using-LCE](https://www.cec.sped.org/Publications/LCE-Transition-Curriculum/Benefits-of-Using-LCE)) is an online curriculum that provides a complete framework of objectives, lesson plans, fact sheets and worksheets that cover three domains of adult living in the 21st century – daily living skills, self-determination and interpersonal skills, and employment skills.
- Skills to Pay the Bills ([https://www.dol.gov/odep/topics/youth/softskills/](https://www.dol.gov/odep/topics/youth/softskills/)) is a curriculum developed by ODEP focused on teaching “soft” or workforce readiness skills to youth, including youth with disabilities. Contains 6 lessons and additional materials.
• Soft Skills ([http://www.ncwd-youth.info/topic/soft-skills](http://www.ncwd-youth.info/topic/soft-skills)) is a publication from the National Collaborative on Workforce and Disability (NSWD) that provides resources describing soft skills and guidance on how to develop these skills.

• Workforce Innovation Technical Assistance (WINTAC) ([http://www.wintac.org/topic-areas/pre-employment-transition-services/overview/workplace-readiness-training](http://www.wintac.org/topic-areas/pre-employment-transition-services/overview/workplace-readiness-training)) provides an overview of workplace readiness training and related activities.

Bibliography


NCDHHS. (2020, 09 03). NCDHHS. Retrieved from NCDVR Grant Opportunities: https://www.ncdhhs.gov/about/grant-opportunities/vocational-rehabilitation-grant-opportunities


Attachment A : Student Satisfaction Surveys