

# **MRS** *PROMOTING ABILITIES*

**Michigan Rehabilitation Services**

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

October 1, 2011



**LARA**  
**LICENSING AND REGULATORY AFFAIRS**  
**CUSTOMER DRIVEN. BUSINESS MINDED.**

# TABLE OF CONTENTS



## INTRODUCTION ..... 6

- What is meant by Transition services? ..... 6
- What is the IDEA and why is it so important to Transition? ..... 7
- What is the Rehabilitation Act and why is it so important to Transition? ..... 7



## EDUCATION AND MRS PARTNERSHIP ..... 7

- How can MRS and schools best work together to benefit students? ..... 7
- How do all the pieces of Transition fit together and who is responsible for what? ..... 8
- What is typically considered education's responsibility in Transition? ..... 8
- What is typically considered MRS' responsibility in Transition? ..... 8
- What is the role of school transition coordinators in the Transition process? ..... 9
- What is the role of MRS counselors in the Transition process? ..... 9
- What revenue sharing agreements are available through MRS? ..... 10
- What are the responsibilities of other agencies (DCH, DHS, MWAs, CILs, etc) in providing Transition services? ..... 11
- How can counselors and schools best use other resources? ..... 11
- Why are there differences between the provision of vocational rehabilitation services and Transition services in different areas of the state? ..... 11
- What should happen if there are conflicts between school staff and MRS? ..... 11
- Can MRS Transition services be provided to students where there is no Cash Match Agreement? ..... 12
- What is "Order of Selection for Services (OSS)" and how would OSS impact on Cash Match Agreements and individual students? ..... 12
- What is Michigan - Transition Outcomes Project (MI-TOP)? ..... 12
- Are all students in special education eligible for MRS services? ..... 13
- How can schools best determine who should be referred to MRS? ..... 14
- How early in a student's school career should MRS become involved? ..... 14
- What is the difference between entitlement for special education services and eligibility for vocational rehabilitation services? ..... 14
- What documentation should school staff provide to MRS when they refer students? ..... 15
- What is the best way to coordinate all the referral paperwork (application, referral form, releases and disability documentation) so that counselors receive needed documents in a timely manner and so all the dates match in AWARE (MRS Case Management System)? ..... 15
- In order for MRS and schools to release and exchange student information, is it necessary to have a signed release? ..... 15
- What are some strategies that schools and MRS can use to support MRS involvement in student IEPs? ..... 16
- Can MRS attend an IEP for a student who is a minor without parent/guardian consent? ..... 16
- What is a typical timeline for determining eligibility for students? ..... 16
- Can an individual with a disability qualify for special education if he/she has already earned a GED? ..... 17

- Can students with disabilities receive MRS services if they are not currently involved in special education programming? ..... 17
- How do school psychologists diagnose specific learning disabilities (SLD)?..... 17
- Can students with disabilities attending private, charter or home schools receive MRS services? ..... 17
- Because school psychologists don't diagnose ADD or ADHD, what should counselors do to determine MRS eligibility for students with ADD or ADHD? ..... 17
- How should counselors handle referrals of students who are covered through Auto No-Fault Insurance?..... 18
- Can students be made eligible for MRS if it is anticipated that they will only be able to work part-time? ..... 18
- Do MRS orientations have to be provided to all 9th and 10th graders and does this have to be done in a group format? ..... 18
- What is the difference between Transition Assessments and Vocational Assessments/Evaluations? ..... 19
- Are schools responsible to provide Vocational Assessments/Evaluations? ..... 20
- How do schools and MRS provide Vocational Assessments to students? ..... 20
- Do schools have the responsibility to provide updated psychological testing on special education students? ..... 21
- What school documents can be used to determine a student's disability and functional abilities? ..... 21
- Why is more than one Vocational Assessment/Evaluation conducted for some students? ..... 21
- What is the EDP and how can it be used in Transition? ..... 22
- How can MRS counselors best use information from the SOP?..... 22
- May assessments/interest inventories from EDPs be used as the Transition Assessment information that is a required as part of the Transition plan? (Answer to this question was provided by Rick Ballentine from Ingham ISD.) ..... 22



**INDIVIDUAL PLAN FOR EMPLOYMENT (IPE)..... 23**

- What should counselors do when students have no idea what they want to do? ..... 23
- What should counselors do when referrals are received right before exit from high school and there is not enough time to formulate an IPE as required by the Rehabilitation Act?..... 23
- What should happen when students appear to be unrealistic in their career goals?..... 24
- How can Transition professionals effectively work with students who want to attend college, whose academic ability is at 3rd- 4th grade reading, writing and math levels? ..... 24
- Do parents and legal guardians have to sign the IPE? ..... 25
- Are students engaged in unpaid work experiences required to have work permits? ..... 25



**COORDINATION AND PROVISION OF SERVICES ..... 26**

- How is it decided whether MRS or schools should pay for appropriate Transition services?.. 26
- When is MRS responsible to pay for vocational services? ..... 26
- What types of services may MRS fund for Transition students?..... 26
- Who determines how dollars from Cash Match Agreements are used? ..... 26
- Can MRS fund college training for students who are dual enrolled and are still in high school? ..... 27

- Can Cash Match Agreements be used for students who have exited high school?..... 27
- When is it appropriate for MRS to purchase assistive technology for students?..... 27
- How can more work experiences be provided to students? Students often want to be paid, but MRS doesn't always have enough funds to provide this service. Are volunteer activities legal? ..... 27
- What is MRS' responsibility regarding driver training? ..... 28
- Are schools responsible to provide only accommodations to students in required classes toward the merit curriculum, or are they responsible to provide adaptations as needed and appropriate?..... 28
- What is a Personal Curriculum (PC)?..... 28
- Can schools refuse to do PC's for students? ..... 28



## POST-SECONDARY TRAINING AND FINANCIAL AID..... 29

- What is the role of MRS in helping students access and prepare for post-secondary education?..... 29
- Can students who exit high school with a Local Certificate of Completion/Attendance receive Financial Aid for college? ..... 29
- What is MCTI and how is MCTI connected to MRS?..... 30
- Which students are the best candidates for MCTI?..... 31
- What should counselors do when the documentation that a school is providing does not meet the requirements set by MCTI? ..... 31
- What is MRS' role in post-secondary education in terms of planning and provision for support? ..... 31
- How should counselors respond to the student who asks, "Why do I need to apply for financial aid? Why can't MRS cover all of my post-secondary costs?" ..... 31
- How should counselors negotiate situations where teachers, students and parents have predetermined that a student will be attending post-secondary training and where they will be going before MRS has gotten involved? ..... 32
- What documentation do post-secondary institutions require in order to provide accommodations? ..... 32
- Why don't colleges automatically accept accommodations written into IEPs? ..... 32



## EMPLOYMENT..... 32

- Are employers recognizing the Local Certificate of Attendance/Completion as a High School Diploma when hiring employees? ..... 32
- What is supported employment?..... 33
- What is MRS' role in supported employment?..... 33
- How can MRS and schools assist students and families in receiving supported employment services and long-term intensive job supports from DCH? ..... 33
- When is it appropriate for MRS to fund job coaching services to students who are still in high school? ..... 33
- Can MRS fund job coaching for summer jobs for students? ..... 34
- Can MRS count community services such as AmeriCorps, Vista or the Peace Corps as a successful employment outcome?..... 34



**RESOURCES ..... 35**

- **Document Description ..... 35**
- **Acronym Guide ..... 37**
- **LINKS ..... 38**



## INTRODUCTION

The purpose of this document is to provide guidance to the most frequently asked questions asked by Michigan Rehabilitation Services (MRS) counselors and special educators regarding Transition and emphasizes how MRS and education work together on behalf of students with disabilities. The most recent update of this document is October 1, 2011.

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

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

Transition services are services that facilitate and support the movement of high school students with disabilities into adult life activities. The primary role of MRS is to facilitate the Transition from school to employment. Employment-related activities must be coordinated with educational activities of the school (many of which relate to future employment) and with other agencies that are supporting students including but not limited to Department of Community Health (DCH), Centers for Independent Living (CILs) and Community Rehabilitation Organizations (CROs). MRS and the Michigan Department of Education/Office of Special Education - Early Intervention Services (MDE/OSE-EIS) have a joint mandate to provide Transition services. The definition of Transition services used by MRS under the Rehabilitation Act is very similar to the definition used by the Department of Education; however, there are some minor differences since the reauthorization of the Individuals with Disabilities Education Act (IDEA) in 2004. The definition in the Rehabilitation Act, and used by MRS, includes language that is specific to vocational rehabilitation that is not referenced in the definition used by education.

According to the Rehabilitation Act:

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

According to the IDEA as amended in 2004:

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

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

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

The IDEA is federal legislation that mandates a free appropriate public education in the least restrictive environment for children with disabilities. This law requires that planning and activities occur to prepare individual students for adult life beginning at age 16. The IDEA mandates that each student have an Individual Education Program (IEP) that identifies appropriate Transition services that are needed for the student. The IDEA was last amended in 2004.

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

The Rehabilitation Act is federal legislation designed to assist persons with disabilities to prepare for, obtain and maintain employment consistent with their interests, abilities and capabilities in the context of a state/federal partnership. The Rehabilitation Services Administration (RSA) distributes funds to states to provide vocational rehabilitation services. RSA also provides direction and oversees how funds are spent to insure that the funds are being used in accordance with the Rehabilitation Act.

Transition services are one of the priorities for Congress in the most recent amendments to the Rehabilitation Act. The Rehabilitation Act also provides states with funding for independent living services, supported employment and client assistance services. Last amended in 1998, the Rehabilitation Act added provisions to ensure that people with disabilities have increased choices in services and service providers (informed choice), improved employment outcomes and a better aligned vocational rehabilitation system with the workforce development system (Michigan Works!).



### **EDUCATION AND MRS PARTNERSHIP**

#### **How can MRS and schools best work together to benefit students?**

- Building relationships between schools and MRS is imperative to build a seamless Transition program. Productive partnerships are based on mutual respect and understanding of the challenges and responsibilities of each respective partner. Like all relationships, partnerships between schools and MRS take effort, communication and ongoing improvement. Effective collaboration is worth the effort because when schools and MRS work together, students benefit. Schools and MRS both have an equal responsibility to build and renew their partnership.

Most school and MRS partnerships have local written agreements. A best practice is to carefully review the agreement each year and make sure that the agreement is updated and relevant. When schools and MRS review the written agreement together, it presents an opportunity for both partners to bring up issues or concerns and come to mutual understanding regarding the provision of Transition services at the local level.

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

MRS provides vocational rehabilitation services in an individualized manner and therefore services vary from one person to another. Vocational goals are based on student interests, aptitudes and abilities and services are provided based on individual needs. A service that is provided to one person may not be appropriate for another.

There are many strategies that schools and MRS use in providing orientations, referring students and involving MRS in the IEP process. Practices that work in one community may not work in another. It is critical to establish an effective school and MRS partnership that best meets the needs of your community and strengthens the relationship between school and MRS staff in order to promote positive student outcomes. Stay open to new ways of doing things and when changes are made, communicate.

Inevitably there are times when schools and MRS struggle to agree on how to work together. Miscommunication and frustration are a normal part of all partnerships. When schools and MRS face these kinds of challenges, it is helpful to first seek to understand the perspective of the other partner and to practice the most respectful interpretation. Personalizing disagreements or playing the blame game are not helpful and will not produce desired results. Keep in mind who loses when partners don't practice positive communication and problem solving – students.

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

There is no single prescription for making all the pieces fit and there are variations from one community to another based on available resources. The basis of the Transition process is “a coordinated set of activities.” Each Transition partner works collaboratively to make the pieces fit in a manner that honors the student’s interests, aptitudes, abilities, needs, priorities and informed choice. Schools have primary responsibility for Transition services prior to exit from high school. MRS is responsible for providing vocational rehabilitation services leading to employment for eligible students. DCH provides supported employment, independent living, or other mental health services. These broad parameters must be elastic to meet the needs of individual students in the communities in which they live, recognizing the eligibility and funding restrictions of each partner.

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

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

- Career exploration and preparation for post-school activities,
- Vocational/career technical training,
- Course of study that is aligned with the student’s post-school vision (goals),
- In-school and community-based work experiences (paid or unpaid),
- Special transportation services, and
- Assistive technology, support services and equipment for use during school activities.

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

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

- Complete an IPE before eligible MRS customers exit school,
- Coordinate the IPE with the IEP or Section 504 plan,
- Plan for a seamless Transition to post-school employment outcomes,
- Arrange or conduct assessments and evaluations related to MRS eligibility and employment plan development,
- Provide vocational counseling to establish appropriate work goals,
- Identify individualized rehabilitation services necessary to reach job goals, and
- Provide expertise regarding workplace adjustment and accommodations.

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

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

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

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

The primary role of the MRS counselor is to assist students through the rehabilitation process ultimately leading to employment. The job of a MRS counselor is rewarding and challenging. Many MRS counselors work with students transitioning from high school; some have exclusive Transition caseload assignments while others have split assignments, working only part time with transitioning youth. Counselors that serve Transition students carry large caseloads. Often this means serving over 100 students at one time. Managing high caseloads is one of the challenges facing MRS counselors and requires hard work, organizational strategies and prioritization of work.

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

The vocational rehabilitation process includes a needs assessment to identify barriers to employment and MRS counselors provide expertise and guidance to remove those barriers. Once a student has selected a job goal, a MRS counselor and the student will develop a vocational plan called an IPE. This plan identifies supports and services that the student needs to reach their employment goal.

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

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

MRS Counselors also link students to other resources in the community that may be helpful to them. The adult system is complicated and often difficult to navigate. MRS Counselors stay abreast of what different agencies offer and what linkages would be most advantageous for students to pursue. They often advocate on behalf of students and make community connections to assist students in the Transition process. Examples of community linkages may include Community Mental Health, Disability Support Services, Centers for Independent Living, AmeriCorps or Michigan Works!.

## What is the MRS definition of youth?

MRS recently developed new parameters to define its youth customers. The following are the new definitions:

### **Transition Youth (Enrolled in Secondary Education)**

Individual with a disability:

- Age 14-26 at application **AND**
- Enrolled in the K-12 education system including students in traditional public schools, ISDs, private schools, charter schools, alternative schools or schools for individuals with disabilities such as the Michigan School for the Deaf, as well as 504 students, home-schooled students and students in correctional facilities.

### **Young Adult (NOT Enrolled in Secondary Education)**

Individual with a disability:

- Age 14-26 at application **AND**
- **Not** enrolled in the K-12 education system including students in traditional public schools, ISDs, private schools, charter schools, alternative schools or schools for individuals with disabilities such as the Michigan School for the Deaf, as well as 504 students, home-schooled students and students in correctional facilities.

## What revenue sharing agreements are available through MRS?

***Transfer of Funds (Cash Match) Agreements*** may be established that use non-federal local dollars as contribution for the purpose of capturing federal vocational rehabilitation funds to serve students with disabilities.

A Cash Match Agreement is created to expand vocational rehabilitation services to a targeted group of individuals such as students with disabilities. Local cooperating community partners (such as local or ISDs) contribute funds that are used by MRS to capture federal funds. These combined funds are then used by MRS to provide individualized vocational rehabilitation services leading to employment to students with disabilities from that local community.

A formula is used to determine how much funds are able to be captured to create a Cash Match Agreement. For every local dollar that is contributed, MRS is able to capture about 3 federal dollars. One of the restrictions placed on the local dollars is that they must not be federal dollars. In other words, federal dollars cannot be matched with federal dollars.

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

The availability of cash match funds is dependent upon the total number of MRS dollars available within the county, state, etc. and the number of Cash Match Agreements filed each fiscal year.

***Third Party Cooperative Staffing (Certified Expenditure) Agreements*** are agreements with school partners which entails the use of loaned staff provided by the partner as a contribution to MRS. The partner documents that they have incurred specific expenditures such as wages for loaned staff or supplies and MRS uses that value for match.

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

**Donations and Gifts** are contributions received by MRS from private individuals or organizations. These funds are used by MRS for cost sharing or matching. Donations and gifts cannot use in-kind contributions as an allowable source of matching funds.

### **What are the responsibilities of other agencies (DCH, DHS, MWAs, CILs, etc) in providing Transition services?**

Several agencies have roles in Transition depending upon student's disabilities, vocational goals, and independent living needs, as well as other unique factors. These agencies may include DCH, Department of Human Services (DHS), Michigan Works! Agencies (MWAs) and CILs. Each agency has some statutory provisions and/or service policies about their role in Transition or youth services. The concept of Transition as a coordinated set of activities with an outcome-oriented process is reflected in the federal and state legislation and code that direct the activities of DCH and DHS.

IDEA requires that related services be considered during an IEP. These related services may be provided by agencies and individuals outside of the educational system. When well coordinated, a variety of agencies come together in cooperation with educational entities to support students unique Transition needs and goals. The IDEA also requires that the Local Education Agency (LEA, i.e. school) invite agencies to the student's IEP who are likely to pay for or provide Transition services to students. The law stops short of requiring attendance by those identified agencies.

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

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

When working with students, listening and understanding student unique needs, interests, and goals will help to determine which resources are needed. Through engaging in collaborative conversations, all community partners can develop a unique plan to support students in achieving his/her individualized goals.

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

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

MRS and the Department of Education are taking steps to identify and promote best practice and evidence-based practices to bring increased consistency to Transition services statewide. This is an ongoing process as new data become available and new programs and practices are identified and communicated to field staff.

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

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

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

### **Can MRS Transition services be provided to students where there is no Cash Match Agreement?**

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

### **What is “Order of Selection for Services (OSS)” and how would OSS impact on Cash Match Agreements and individual students?**

Currently Michigan is not in an OSS. An OSS would be implemented by MRS if there are not enough resources in the state to serve all eligible customers. When this happens, a waiting list is developed and MRS prioritizes the most significantly disabled individuals.

An OSS does not automatically change Cash Match Agreements. MRS and educational partners would want to communicate to evaluate if the agreements to see if they need to be modified in light of any impacts of OSS. Students who already have an IPE established with MRS when an OSS occurs, would have their plans honored and would not be impacted by OSS.

### **What is Michigan - Transition Outcomes Project (MI-TOP)?**

The MI-TOP facilitates the development of effective systems that support students to achieve post-secondary outcomes, contain measurable student focused planning, student development activities, and continuous family and community involvement. The project supports the implementation of effective Transition practices to ensure all students are prepared for post-secondary education, employment, and independent living.

The MI-TOP is led by a diverse group of Transition professionals comprised of state and local leadership from education, families and community agencies. The MI-TOP core planning team meets on a regular basis to plan, develop and support the implementation of policy and practice that improves the quality and effectiveness of Transition services across the state for students with disabilities.

### **What are the Special Education Indicators that MDE/OSE-EIS is responsible to collect data on and which ones relate the most to Transition students?**

There are several indicators but the ones that address student readiness for life after high school and therefore relate the most to Transition students are Indicators 1, 2, 13 and 14.

#### **√ Indicator 1 – Graduation**

Percent of youth with IEPs **graduating** from high school with a regular diploma compared to percent of all youth in the State graduating with a regular diploma.

#### **√ Indicator 2 – Dropout Rate**

Percent of youth with IEPs **dropping out** of high school compared to the percent of all youth in the state dropping out of high school.

### √ Indicator 13 – Content of IEPs

Percent of youth aged 16 and above with an IEP that includes **coordinated, measurable, annual IEP goals** and transition services that will reasonably enable the child to meet the post-secondary goals.

### √ Indicator 14 – Post-School Outcomes

Percent of youth who had IEPs, are no longer in secondary school and who are **competitively employed**, enrolled in some type of **post-secondary school**, or both, within one year of leaving high school.

**Can districts "hold" diplomas when a student has met the graduation requirements under the Michigan Merit Curriculum (MMC) to provide additional transition services such as employment or life skills and issue the diploma after those transition services have been provided?**

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

**How can a MRS counselor effectively give input at IEPs when they believe that the school is not providing enough options to students?**

When the MRS counselor disagrees with the direction of the school, it is usually best to voice concerns in a private setting with school staff rather than at an IEP. However this is not always possible. When concerns become apparent at IEPs, the counselor needs to seek clarification taking an approach to seek to understand the direction the school is taking which may provide information that the counselor needs to be comfortable with the plan. When all else fails, a counselor may find it appropriate to voice concerns at the IEP or privately with students and parents.

**Schools tend to not want 19 year old students (and older) in high school with students who are much younger (IE 14 years old) even though technically students with disabilities can stay in school until they are 26. What options do students have to complete their requirements to earn their high school diploma when they are 19 years old plus?**

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

- Alternative schools,
- Dual enrollment at a community college or university,
- Vocational training at a secondary school voc-tech program,
- Distance learning, or
- On-the-job training (OJT)



### REFERRALS TO MRS AND ELIGIBILITY

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

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

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

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

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

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

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

Michigan requires each school must give students the opportunity to create an Educational Development Plan (EDP) prior to entering high school. This begins to establish direction for student. A statement of needed Transition services must be included in IEP not later than the first IEP to be in effect when the child turns 16. MRS becomes actively involved prior to a student graduating or exiting high school or when an eligible student requires vocational rehabilitation services to obtain an employment outcome while in high school.

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

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

Students are entitled to a Free Appropriate Public Education (FAPE) in the least restrictive environment meaning that all students with disabilities in Michigan have the right to receive an education. When students apply for MRS (vocational rehabilitation services), students have the right to apply, but must meet the eligibility criteria to receive those services. The services students are eligible for differ depending on each student's vocational needs. Students can also lose their eligibility by not following through with agreements such as agreements made in their IPE and not staying in touch with their counselor. This distinction between entitlement and eligibility is significant and is a shift for students and their families who are accustomed to functioning under an entitlement system. It is the role of educators and counselors to inform students and families about this difference, so students and families understand new processes and responsibilities that are part of eligibility based systems.

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

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

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

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

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

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

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

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

Yes. However if a school provides information to MRS without a release, the school is in violation of their policy but MRS is not. MRS requires a release from the student if they are 18 or older and their own guardian or from their parent/guardian for MRS staff to share information with schools verbally, in writing or in the form of reports. Therefore it is best for everyone involved if education and MRS both get releases.

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

MRS participation in IEPs enhances the student transition process in a variety of ways. IEPs are a great opportunity for counselors to learn about a student's strengths and post-secondary vision. Counselors can share critical information about the role of MRS to promote a seamless transition for student success.

MRS attendance at IEPs can be a challenge in many communities for several reasons including the size of MRS caseloads, the demands of counselor caseloads and/or the geographic area that a MRS counselor is assigned. Given this dilemma, there are many helpful strategies to promote and support MRS counselors to be able to be involved in student IEPs.

Often misunderstandings occur in the invitation process when schools invite MRS to IEPs. The IDEA requires schools to send invitations to an agency "likely to provide or pay for Transition services." This is not an option for schools but it may not be the most effective way to actually insure MRS involvement in the IEP process.

Schools and MRS counselors should work together to address possible options available such as:

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

Another alternative(s) for coping with the logistical demands of IEPs is to use other opportunities to bring students, families, teachers, and MRS counselors together. IEPs are important but there are many other ways to meet and interact with students. Many MRS counselors provide information about MRS during parent/teacher conferences, evening activities, Transition fairs, etc. Students often meet with their MRS counselor several times during the year to develop their IPE outside of the official IEP process. Students may then present their IPE at their IEP without the MRS counselor needing to be there.

The IEP process is a valuable part of promoting student success. Creative solutions to scheduling student IEPs is in everyone's best interest. MRS participation in IEPs enhances the student's transition process in a variety of ways. IEPs are a great opportunity for counselors to learn about a student's strengths and post-secondary vision. Counselors can share critical information about the role of MRS to promote a seamless transition for student success.

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

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

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

If school records are available describing disabilities and substantial impediments to employment, and students are found to require MRS services, eligibility determination is made within the 60-day time frame for Eligibility Determination. The intent of the Rehabilitation Act, in encouraging the use of existing data, is to reduce the time required for eligibility determination. New information can

always be added to case files and integrated into eligibility considerations as time goes on. It may be necessary to conduct new evaluations to determine eligibility and to have the information needed to determine appropriate vocational rehabilitation services.

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

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

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

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

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

**How do school psychologists diagnose specific learning disabilities (SLD)?**

In Michigan, prior to the 2004 reauthorization of the IDEA, the identification of a student suspected to have a SLD was based on a single, specific method - the severe discrepancy model. The 2004 reauthorization of the IDEA expressly prohibits all states from requiring the use of the severe discrepancy model. As a result, the criteria for determining SLD eligibility was revised in 2006 that provides schools with some choices. Those choices include the use of methods for determining SLD eligibility based on the use of scientific, research-based interventions and patterns of strengths and weaknesses. The need to develop updated methods for determining SLD eligibility is the driving force behind development of these criteria.

Therefore, consistent with the IDEA federal regulations at 34 CFR § 300.309 and the Michigan Administrative Rules for Special Education (MARSE) at R 340.1713, schools must use the following processes for determining the existence of a SLD:

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

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

Yes. MRS vocational rehabilitation services are available to all eligible students regardless of whether or not they are attending public or charter schools or other schools such as private or home schools. MRS counselors can access cash match funds to purchase services if there is a cash match agreement in the same community where the student attends school.

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

**Because school psychologists don't diagnose ADD or ADHD, what should counselors do to determine MRS eligibility for students with ADD or ADHD?**

An IEP certifies that a person is presumed eligible for MRS services under the Rehabilitation Act. However, this information may not be enough to determine an individual's rehabilitation needs and may need to be supplemented. With signed releases, counselors can contact a student's treating

physician for more detailed diagnostic information. If the available information is not adequate, diagnostic evaluations and Vocational Assessments may be purchased by MRS while the student is still in school.

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

When MRS receives a referral for a student who is covered through Auto No-Fault Insurance, there are two scenarios: one in which a student has a preexisting disability prior to the auto accident and a second in which a student does not have a preexisting disability. In both situations, counselors should contact the MRS disability management program for assistance regarding the responsibility of the insurance company and MRS.

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

In the second scenario, when the student has no preexisting disability, but becomes disabled as the result of an auto accident, insurance companies often dispute vocational rehabilitation costs because the student has no established work history. In this type of situation, a dual case can be considered. When it is agreed upon that there will be a dual case, the dual case will be managed by both a case manager from the insurance carrier and the MRS counselor.

In both cases, the insurance carrier has primary responsibility for vocational rehabilitation costs when the disability is due to a motor vehicle accident. Counselors, disability management counselors as well as educational partners, must work jointly to ensure that schools and MRS are not supplanting the carrier's legal responsibility in services provided. Good communication between all concerned, including the insurer and the student and their family, is important to ensure appropriate Transition services for the student are provided.

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

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

### **Do MRS orientations have to be provided to all 9th and 10th graders and does this have to be done in a group format?**

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

In some situations it has been determined that a student needs MRS services as a 9<sup>th</sup> or 10<sup>th</sup> grader. In these situations it is necessary to conduct an orientation for that student.

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

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

MRS can accept a list of names from school staff, but school staff should obtain written informed consent to give out the student names to an agency which in this case is MRS.

### **Do MRS counselors need an updated psychological report to determine eligibility for MRS services?**

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

MRS counselors often work with old psychological reports and use other student documentation to glean information about the student such as the Transition or Vocational Assessment, Work Experience Reports, the IEP, SOP, etc. If the MRS counselor has determined that it is necessary to obtain updated psychological testing to conduct vocational planning, they can always ask the school to update the testing and sometimes the school will do so. Ultimately however, it is the responsibility of MRS to purchase and coordinate any updated testing that they school has determined to be unnecessary and that MRS feels to be necessary.

### **How are Extended Assessments used with Transition customers?**

Sometimes an Extended Assessment is used by MRS when the counselor has questions about a Transition customer's ability to benefit from MRS services. Counselors sometimes find this step necessary and helpful to assess a customer's barriers to employment prior to MRS Eligibility or to determine that the customer may not be appropriate for MRS at the present time. Extended Assessments do delay the Eligibility process.



### **VOCATIONAL ASSESSMENT**

### **What is the difference between Transition Assessments and Vocational Assessments/Evaluations?**

Transition Assessment is a planned, continuous process of obtaining, organizing, and using information to assist individuals with disabilities of all ages and their families in making all critical Transitions in students' lives both successful and satisfying – Clark 1998. Whereas Vocational Assessments/Evaluations focus more on career preparation and work-related areas, Transition Assessments are holistic assessments of student overall functioning. Transition Assessments are:

- A process of gathering information, which helps each student set goals, establish learning targets and learning progressions that lead towards their desired post-secondary vision (goals)
- Not a one time or annual event – information needs change as students become more focused on their post-secondary goals

- Multiple informants to avoid bias: Student, parent and teacher must be included as informants at minimum
- Usually more than one tool to provide all the needed information for all students in any one class, school or district
- Completed for all students with an IEP. An initial assessment may indicate an area(s) of need for more in-depth assessments, IEP goals, Transition services and/or Transition activities

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

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

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

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

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

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

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

- Student and Parent Interviews
- Employer Interviews
- Job Shadows
- On-the-job evaluation (OJE)
- Job Try Outs
- Open Options
- Formal Assessments such as CAPS/COPS/COPES, Career Scope, Career Cruising, Self Determination Scales, Adaptive Skills Inventories (ESTR or TPI), American College Testing

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

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

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

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

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

Counselors often play a critical role in informing special educators, parents and students about the consequences of graduating without current testing, especially when students are planning to enter post-secondary training and will need classroom accommodations to be successful. Many, if not most, colleges require psychological testing that is no more than three years old to provide classroom accommodations. In addition, updated testing is needed to be accepted into specific post-secondary training institutions such as MCTI. In these situations, MRS can advocate for and recommend that schools conduct updated, relevant testing. If testing is not done by schools and is needed for rehabilitation planning, MRS may purchase the evaluation.

### **What school documents can be used to determine a student's disability and functional abilities?**

There are many different documents that schools generate for students depending upon the student disability and the IEP. Because this question is so complex, a job aide is attached to the back of the FAQ titled, "[School Documents](#)."

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

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

Career preparation is a developmental process. Students are in a constant state of learning as they grow and change. Aptitudes, abilities and skills evolve as students are exposed to new ideas, information and work experiences. It is best to think of Vocational Assessment/Evaluation as an ongoing process. More information is needed or a different type of assessment/evaluation is needed (for example, a "hands-on" evaluation rather than a paper/pencil or computerized evaluation). Students want to try-out a particular occupation and if it is determined the job is not a good match for them, more assessment may be needed. In other situations, a student may know that they want to pursue a particular career area such as health occupations, but they may need to

look closer at several jobs in that broad career area to find the best match for them (for example, as x-ray technician or phlebotomist). It is the responsibility of special education and MRS to consider whether additional assessments are needed and if so, what assessments are most appropriate to meet the needs of each student.

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

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

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

### **How can MRS counselors best use information from the SOP?**

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

- Background information,
- Post-secondary goals,
- Academic and functional levels of performance,
- Recommendations to assist the student in meeting his/her post-secondary goals, and
- Student input.

### **May assessments/interest inventories from EDPs be used as the Transition Assessment information that is a required as part of the Transition plan? (Answer to this question was provided by Rick Ballentine from Ingham ISD.)**

The EDP has helpful information for Transition. The EDP lists 'short' and 'long' term goals, which can be helpful to note in the "Courses of Study" section of the IEP, such as plans after high school including Career and Technical Training and/or college. In addition, the interest inventories used during the EDP process also identify potential career and employment goals that can be listed in the "Student's Post Secondary Vision (Goal)" portion of the IEP.

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

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

Transition Assessments provide students with information that pertains to the many areas of Transition and gives students an opportunity to select goals that are in alignment with their post secondary vision. Many Transition Assessment tools, such as Enderle-Severson Transition Rating (ESTR) Scale, does this easily and also fosters the concept of self determination with the student and/or family assisting in selecting goals.



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

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

All students are required to have an EDP which indicates a career direction and students with disabilities have a post-secondary vision statement in the IEP which drives the Transition process. The post-secondary vision includes student statements related to adult living, career/employment goals, community participation and post-secondary education or future training. Therefore, counselors can reference student post-secondary vision statements to see what goals students have expressed. This is an opportunity for MRS to provide vocational counseling and guidance to students and have influence upon the direction of the Transition process while the student is still in school. Through dialogue and review of the records, counselors can determine if students need more information or assessment to confirm or modify the direction they are taking. It may be appropriate for students to participate in vocational assessment, job shadowing, job try-outs or work experience to get more information before selecting an IPE job goal.

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

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

After the completion of the eligibility determination and the assessment of vocational rehabilitation needs, students and counselors begin to explore IPE options. MRS policy states that the IPE must be completed no more than 90 days following eligibility certification, “unless the individual and counselor require more time to arrive at an agreed upon plan.” Counselors have the option of delaying the plan until more information is gathered, documenting the reason for the delay, the activities or services planned to complete the IPE, and the anticipated IPE completion date. The student and counselor have the option to write a plan using a career pathway and amend the plan when more information is gathered to select a specific vocational goal. A student can exit high school with a career pathway, however training and placement services cannot be provided until the IPE is amended to reflect a specific job goal.

Student IEPs should be considered in development of the IPE. This is another reason for close collaboration with education partners. When cases are open well before exit from high school and there is good communication between schools and MRS, students and counselors have the opportunity to build upon the school experience and develop meaningful and seamless IPEs.

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

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

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

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

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

It is important to understand that student dreams and aspirations are never wrong. Student post-secondary vision statements are heavily influenced by the student's developmental level, experiences and family involvement.

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

Through vocational counseling and dialogue, a counselor can help customers understand the motivations drawing them in a particular direction. Often counselors can direct a student in discovering a related job that is within his or her abilities and capabilities. For example, if a student with a significant physical disability wants to become a firefighter, perhaps a job in a fire station as a dispatcher, maintenance worker or clerical worker would be closer to his or her capabilities. In the end, however, counselors cannot support an IPE job goal that will not reasonably result in employment.

### **How can Transition professionals effectively work with students who want to attend college, whose academic ability is at 3rd- 4th grade reading, writing and math levels?**

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

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

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

The counseling process should include encouragement to build on existing strengths and also provide information about all the options that exist. Many students are drawn to college because they have heard over and over again about the importance of going to college and they feel it is

something that they should do. It is best to present a range of training options and employment paths to students who have low academic abilities.

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

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

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

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

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

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

Yes they can. Eligible MRS customers who are still in high school who have not yet determined a specific employment goal, a Career Pathway, can be used as an employment goal until the student completes secondary education. After the individual exits high school, the counselor and the customer must amend the IPE as soon as possible to reflect a more specific employment goal. Under a Career Pathway job goal, MRS can not provide many services such as vocational training or job placement. In addition, a Career Pathway can not be used as the job outcome for a successful employment closure.

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

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

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

For more information see the Work Permit Fact Sheet at [http://www.michigan.gov/documents/Work\\_Permit\\_FACT\\_SHEET\\_July\\_2006\\_169123\\_7.pdf](http://www.michigan.gov/documents/Work_Permit_FACT_SHEET_July_2006_169123_7.pdf) and the Work-Based Learning Risk Management Guide at: [http://www.michigan.gov/mde/0,1607,7-140-6530\\_2629\\_8423-17155--,00.html](http://www.michigan.gov/mde/0,1607,7-140-6530_2629_8423-17155--,00.html)



## **COORDINATION AND PROVISION OF SERVICES**

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

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

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

### **When is MRS responsible to pay for vocational services?**

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

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

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

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

### **Who determines how dollars from Cash Match Agreements are used?**

MRS is responsible for the funding. Once local funds are pooled with matching federal dollars, they become the responsibility of MRS and must adhere to MRS rules, regulations and policy. Some

school districts ask MRS to account for funds spent on students in secondary education to satisfy the need for schools to account for matched dollars to ensure that an amount equal to the match dollars were spent on in-school youth.

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

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

### **Can Cash Match Agreements be used for students who have exited high school?**

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

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

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

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

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

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

Volunteer activity is often a preparatory step toward employment. Schools have the option to set up Community Based Instructions (CBI), where students work in the community for school credit. Often these positions are unpaid. Using comparable benefits, MRS and schools can collaborate with Michigan Works! so that some students can gain work experience, earn school credit and get paid at the same time. Keep in mind that earning may affect Social Security Income (SSI) benefits. The Student Earned Income Exclusion formula is a helpful benefit to offset earnings while a student is in high school.

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

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

Since 1998, driver training is no longer a state mandated education service. Thus, under the current law, driver training is a parental responsibility. MRS has no general obligation to provide driver training to students with disabilities. MRS may provide driver training when it has been determined to be an essential service for an individual to become successfully employed. In these cases, driver training is considered a support service to facilitate students' abilities to participate in a required IPE service or in employment. Before driver training is considered, MRS requires that comparable benefits are explored and used when available, and that alternate, more cost effective means of transportation to achieve a desired IPE outcome are exhausted. Provision of a vehicle for driver's training is the family's responsibility.

### **Are schools responsible to provide only accommodations to students in required classes toward the merit curriculum, or are they responsible to provide adaptations as needed and appropriate?**

School districts have the responsibility to provide a "Free Appropriate Public Education in the least restrictive environment." The purpose of the IEP is to document the special education services, supports, **accommodations and modifications** necessary to for the student to access and make progress in the general curriculum. Therefore students can receive supports, accommodations and modifications appropriate for them to participate in required classes in the MMC toward a regular high school diploma.

### **What is a Personal Curriculum (PC)?**

The PC is an option any student/family can explore as a process to modify certain graduation requirements and earn a diploma. All students (including students receiving special education services), have the option of pursuing a PC. The PC gives families and districts an option to explore, reach agreement on and document changes to the state graduation requirements in and personalized way so the student can meet the requirements of the MMC and receive a regular high school diploma. The legislative intent of the PC is to individualize the rigor and relevance of the educational experience. State statute allows a PC to be considered for four reasons:

- Go beyond the academic credit requirements by adding more math, science, English-language arts, or world languages credits,
- Modify the mathematics requirement,
- Modify, if necessary, the credit requirements of a student with an IEP, or
- Modify credit requirements for a student who transfers from out of state or from a nonpublic school and is unable to meet the MMC requirements.

### **Can schools refuse to do PC's for students?**

While every request to modify a student's graduation requirements should be considered, the school district or public school academy may deny a PC request if:

- The request does not comply with state statute,
- Other options for meeting the student's educational needs have not been documented,
- It is not in the best interest of the student, or
- Members of the PC development team cannot reach agreement.



## POST-SECONDARY TRAINING AND FINANCIAL AID

### **What is the role of MRS in helping students access and prepare for post-secondary education?**

Post-secondary education is often a critical step for high school graduates regardless of whether or not they have a disability, to obtain gainful employment. However, traditional college or university training is not always the best course of action for students.

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

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

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

Another challenge for students and families is sorting out the financial aid process to determine how to pay for post-secondary training. MRS counselors have worked with many students to secure financial aid and can provide advice and guidance. MRS uses a needs assessment to determine if financial assistance from MRS can be provided. Obviously, in situations where it is appropriate that MRS assist with post-secondary training costs, this is an enormous help to students.

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

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

- Be a U.S. citizen or eligible noncitizen
- Have a valid Social Security Number (unless you're from the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau)

- Be registered with Selective Service if you are male and 18 to 25 years of age (go to [www.sss.gov](http://www.sss.gov) for more information)
- Have a high school diploma or a GED Certificate or pass an exam approved by the U.S. Department of Education
- Be enrolled or accepted for enrollment as a regular student working toward a degree or certificate in an eligible program at a school that participates in the federal student aid programs
- Not have a drug conviction for an offense that occurred while you were receiving federal student aid (such as grants, loans, or work-study)
- Not owe a refund on a federal grant or be in default on a federal student loan
- Demonstrate financial need (except for unsubsidized Stafford Loans)

Note: Other requirements may apply. Contact your school's financial aid office for more information.

### **What is MCTI and how is MCTI connected to MRS?**

The MCTI is a Community Rehabilitation Center (CRC) administered by the MRS, a bureau of the Department of Licensing and Regulatory Affairs (LARA). The mission of MCTI is to conduct vocational and technical training programs and to provide supportive services needed to prepare Michigan citizens with disabilities for competitive employment. MCTI has a west and east campus and serves a subset of MRS customers who need intensive supports to succeed in post-secondary education.

MCTI East opened in the Spring of 2010 and is located in Detroit. Unlike MCTI West, MCTI East is not a residential program. Students live in their community and attend MCTI during the day. The following training programs are offered at MCTI East:

- Career Readiness Center including Career Assessment Services and Step Up Program,
- Certified Nurse Assistant,
- Dialysis Technician,
- CVS Pharmacy, and
- Employer Based Training (Retail, Pharmacy and Janitorial).

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

- Automotive Technology,
- Cabinetmaking/Millwork,
- Certified Nurse Assistant,
- Culinary Arts,
- Custodial,
- Customer Service,
- Electronics,
- Graphic Communications,
- Grounds Maintenance and Landscaping,
- Machine Technology,
- Office Automation,
- Retail Marketing,
- Pharmacy Technician, and
- Weatherization.

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

incoming students have cognitive and mental or emotional disabilities that interfere with their ability to live independently and sustain work. The supportive services have evolved to meet the changing needs of VR customers who attend MCTI.

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

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

### **Which students are the best candidates for MCTI?**

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

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

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

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

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

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

### **How should counselors respond to the student who asks, "Why do I need to apply for financial aid? Why can't MRS cover all of my post-secondary costs?"**

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

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

Many post-secondary institutions require high school diplomas as admission criteria. In these types of schools, students with Local Certificates of Completion/Attendance are not able to apply. In situations where a post-secondary school has an open enrollment policy, students with Local Certificates of Completion/Attendance are able to apply. However it should be noted that many schools require basic skills testing that limits the classes that a student can enroll in until the student can achieve specific academic levels. In addition, students must pass an “Ability to Benefit” test to qualify for Federal Financial Aid.

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

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

### **What documentation do post-secondary institutions require in order to provide accommodations?**

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

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

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



### **EMPLOYMENT**

### **Are employers recognizing the Local Certificate of Attendance/Completion as a High School Diploma when hiring employees?**

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

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

The most important thing is to focus on the student's strengths and abilities rather than the fact that they don't have a high school diploma. A portfolio highlighting student strengths, abilities and job skills including information about the courses that the student passed in school is a good strategy.

If the employer screens out students without a diploma or is requiring a high school diploma for a job that a student without a diploma has the skills to do, then it is the role of the MRS counselor or job developer to explain the types of classes that students have to pass in order to earn a diploma so that they understand that students with local certificates of completion have job skills and may have passed many classes required for a diploma, but they did not meet all of the requirements.

### **What is supported employment?**

Supported employment is a collaborative program with MRS and the DCH that assists people with the most significant disabilities to become competitively employed in an integrated setting. Supported employment strives to employ individuals who would otherwise not be able to achieve employment by providing significant supports for individuals to learn their job, establishing natural workplace supports and by providing for ongoing follow-along services.

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

MRS counselors can not determine eligibility for DCH supported employment services. However MRS can assist schools in determining which students are likely to need and qualify for those services. When supported employment services for students are required, they should be part of an IPE and coordinated with the DCH. As with any other service provided by MRS while a student is still enrolled in high school, the service being provided should not be part of FAPE.

MRS has many longstanding Cash Match Agreements with local DCH entities. Funds from these agreements are used to provide supported employment services to adults with disabilities that qualify for employment services from both MRS and DCH.

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

One of the most important roles that MRS counselors have is helping to coordinate referrals to DCH for students likely to be eligible for DCH services, supported employment and long-term intensive job supports or follow-along services. Teachers, parents and students need to understand the importance of applying for DCH services in the student's last year of high school and how to access DCH and what information will be needed by DCH to determine eligibility. When students are eligible for MRS and DCH services, they are in a position to access supported employment services as an adult. If it is likely that students will require supported employment services, representatives from MRS and DCH may be invited to the student's IEP to coordinate services. Laying the groundwork for this while a student is still in high school ensures a seamless Transition to adult supported employment services.

It is through supported employment services that students receive long-term job supports. While MRS often funds job placement and short term, intensive job coaching for supported employment customers, DCH provides the long-term, ongoing job supports after the student leaves school. For this reason it is very important that students requiring long term support apply for DCH supported employment services.

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

Job coaching may be funded by MRS if the student is eligible for MRS services and has an IPE that identifies job coaching as a needed service.

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

Yes. Summer employment is not typically part of FAPE. MRS counselors can provide short-term job coaching to support summer employment on a case by case basis. The employment should be considered an essential step in the student's progression toward their future career and be consistent with their IPE and/or the employment should have a strong potential of becoming permanent.

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

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

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

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

Michigan offers a free on-line calculator to help individuals determine how working will impact upon their benefits. The website is available at <http://www.mi.db101.org/planning/>.

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

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

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

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

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

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

can produce significant barriers to providing job training and employment opportunities for students who receive benefits.

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



## RESOURCES

School Document Name	Document Description	Information Available to Determine Disability?	Identifies Career Direction?	Identifies Functional Abilities?
<b>Education Development Plan (EDP)</b>	An Education Development Plan (EDP) documents the ongoing process in which students identify career goals and a plan of action to achieve them. All students have an EDP including students with disabilities. Students develop their first EDP in middle school, identifying an initial career goal and educational experiences. The purpose of the EDP is to provide every student with a guide or map to take effective steps to reach their career goals. For example if a student plans to be a nurse, they should be taking biology, chemistry and advanced math to help them prepare for their future coursework in post-secondary training. Students, parents and/or guardians and school counselors use the EDP to direct the course of study that the student is taking based on career exploration, career assessment information, school performance, and expressed interests. The EDP is coordinated with the IEP and is the foundation that the IPE is built upon.	No	Yes	No
<b>Individualized Education Program (IEP)</b>	Each public school child who receives special education and related services must have an Individualized Education Program (IEP). An individualized education program means one that is designed to meet the unique educational needs of one child, as defined by federal regulations helps kids reach their goals. The IEP must be tailored to the individual student’s needs as identified by the evaluation process and must help teachers and related service providers understand the student’s disability and how the disability affects the learning process. In other words, the IEP should describe how the student learns, how the student best demonstrates that learning and what teachers and service providers will do to help the student learn more effectively.	Yes	Yes	Yes
<b>Present Level of Academic Achievement and</b>	The purpose of this statement in the IEP is to provide an overview of factors that impact the student’s performance and subsequent development of programs and services to meet the student’s unique learning needs. The PLAAFP	Possibly	Possibly	Yes

<b>Functional Performance (PLAAFP)</b>	provides a foundation for developing rigorous supports to create an opportunity for greater student success. It is the basis from which all other Individualized Education Program (IEP) components are developed. Each area of need identified in the present level must be addressed in another appropriate section of the IEP form.			
<b>Transition Assessments</b>	An ongoing process of collecting data on individual student needs, preferences, and interests as they relate to the demands of current and future working, education, living, and personal and social environments. Assessment data serve as the common thread in the Transition process and form the basis for defining goals and services to be included in the IEP.	No	Yes	Yes
<b>School Psychological Report</b>	A report written by a certified school psychologist or licensed psychologist in the school setting that provides an analysis and other evaluation data about a student's academic and behavioral functioning. The primary purpose of the report is to help school personnel and parents understand the relationship between the problem for which the student was referred, the cause(s) of that problem, and why the student is not progressing in the general education curriculum. The problem analysis and evaluation data form the basis for the development of appropriate interventions and is applicable to all psychological reports whether generated to address exceptional education questions, Section 504 accommodations, counseling and consultation services, or any of a variety of educational service concerns. School psychological testing is no longer required under the IDEA every three years unless it is determined that there has been a change in a student's disability and updated testing is needed to for appropriate educational planning for the student. In situations where the student's disability has remained the same, the REED is used to determine continued eligibility for special education services.	Yes	Possibly	Yes
<b>Review of Existing Evaluation Data (REED)</b>	A process that documents that student data has been reviewed by a team of qualified school staff for the purpose of preparing to evaluate a student for special education eligibility or for redeterminations of eligibility for special education.	Yes	No	Yes
<b>Vocational Assessment/ Evaluation</b>	Vocational Assessments help students determine their career direction by assessing student interests, aptitudes, abilities and job skills. There are many different vocational assessment tools used by schools and they may be formal or informal. Often combinations of assessment tools are provided to students during their educational experience.	Possibly	Yes	Yes
<b>Summary of Performance (SOP)</b>	<i>For a child whose eligibility for school is ending due to graduation or age, a LEA shall provide the child with a summary of the child's academic achievement and functional performance ( IDEA 04).</i> The SOP is a separate document from the IEP to be used by the student. It can be utilized as a good source of information concerning the student's abilities and needs. The SOP may be helpful in	Possibly	Possibly	Yes

	<p>determining student supports and therefore, what vocational rehabilitation services are needed for successful employment. The SOP may include:</p> <ul style="list-style-type: none"> <li>• Background information,</li> <li>• Post-secondary goals,</li> <li>• Academic and functional levels of performance,</li> <li>• Recommendations to assist the student in meeting his/her post-secondary goals,</li> <li>• The student's input.</li> </ul> <p>This information could be made available to MRS by the student.</p>			
<p><b>Social Work, Occupational Therapy, Physical Therapy, Audiology, Vision, ASD Consultant, Mobility, Assistive Technology, Speech and Language, etc Reports</b></p>	<p>There are many school reports that are generated by school specialists that provide a variety of information about students. These reports address the related services that students may need to fully participate in and benefit from their educational program.</p>	Possibly	Possibly	Possibly
<p><b>Medical Reports Submitted to Schools</b></p>	<p>Often forms are sent by schools to a student's physician to verify that a student is being treated for a specific condition. Schools then may use this information as part of the evaluation process to determine whether or not a student has a disability. With parent (or student if over 18) consent this information could be made available to MRS. Common medical reports that are often made available to MRS counselors by schools may contain information about the student's disability.</p>	Yes	No	Possibly

### Acronym Guide

ACT	American College Testing
ADA	American with Disability Act
ADD	Attention Deficit Disorder
ADHD	Attention Disability Hyperactivity Disorder
CBI	Community Based Instructions
CIL	Center for Independent Living
CRC	Community Rehabilitation Center
CRO	Community Rehabilitation Organization
DCH	Department of Community Health
DHS	Department of Human Services
EDP	Education Development Program
EOR	Employer of Record
ESTR	Enderle-Severson <b>Transition</b> Rating Scale
FAPE	Free Appropriate Public Education
GED	Graduation Equivalency Diploma
IDEA	Individuals with Disabilities Education Act
IEP	Individual Education Program
IPE	Individual Plan for Employment
ISD	Intermediate School District
LARA	Licensing and Regulatory Affairs

LEA Local Education Agency  
MARSE Michigan Administrative Rules for Special Education  
MCTI Michigan Career and Technical Institute  
MDE/OSE-EIS Michigan Department of Education/Office of Special Education-Early Intervention Services  
MI-AHEAD Michigan-Association of Higher Education and Disabilities  
MI-TOP Michigan-Transition Outcome Project  
MMC Michigan Merit Curriculum  
MOIS Michigan Occupational Information System  
MWA Michigan Works! Agency  
MRS Michigan Rehabilitation Services  
OJE On-the-Job Evaluation  
OJT On-the-Job Training  
OASIS Online Academic Student Information System  
OTA Occupation Training Agreement  
OSS Order of Selection  
REED Review of Existing Evaluation Data  
RSA Rehabilitation Services Administration  
PC Personal Curriculum  
PLAAFP Present Level of Academic Achievement and Functional Performance  
SLD Specific Learning Disability  
SSDI Social Security Disability Income  
SSI Social Security Income  
SOP Summary of Performance

## **LINKS**

<http://www.resa.net/specialeducation/transitionplanning/studentexit/>  
Quick Guide to High School Completion for Students with Disabilities.

[www.michigan.gov/mde](http://www.michigan.gov/mde)  
Michigan Department of Education

[www.michigancap.org/](http://www.michigancap.org/)  
Michigan College Access Portal

[www.mi-top.cenmi.org/](http://www.mi-top.cenmi.org/)  
Michigan Transition Outcomes Project

[www.michigantsa.com/](http://www.michigantsa.com/)  
Michigan Transition Services Association

[www.ncwd-youth.info/](http://www.ncwd-youth.info/)  
National Collaborative on Workforce and Disability dedicated to ensuring that transition age youth are provided full access to high quality services in integrated settings to gain education, employment and independent living.

[www.nsttac.org/](http://www.nsttac.org/)  
National Secondary Transition Technical Assistance Center

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

[www.seac.cenmi.org/](http://www.seac.cenmi.org/)  
Special Education Advisory Council

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

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

Think Beyond the Label

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

Division on Career Development and Transition

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

Vocational Rehabilitation Service Models for Individuals with Autism Spectrum Disorders

[www.communityinclusion.org/article.php?article\\_id=211&type=topic&id=15](http://www.communityinclusion.org/article.php?article_id=211&type=topic&id=15)

Institute for Community Inclusion

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

Center for Applied Special Technology

<http://www.michigan.gov/careers>

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

<http://www.mois.org>

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

<http://www.going-to-college.org>

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

<http://www.michigancc.net>

Resource information about Michigan community colleges and a directory of all Michigan post-secondary institutions.

<http://www.petersons.com>

Provides a wide range of educational information and support.

<http://www.michigan.gov/mrs>

State bureau site for job seekers with disabilities.

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

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

<http://www.health.gwu.edu>

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

<http://www.mi-car.org>

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

<http://www.michigan.gov/disabilityresources>

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

<http://www.copower.org/>

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

<http://www.ilr.cornell.edu/edi/pcp/index.html>

An overview of the person centered planning process