An analysis of state Pre-Employment Transition Services policies

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Abstract.
BACKGROUND: In July 2014, the Workforce Innovation and Opportunity Act (WIOA) was signed into law, amending the Rehabilitation Act of 1998 and establishing new workforce initiatives for state vocational rehabilitation (VR) agencies. Final regulations were released in July 2016, requiring state VR agencies to fund and coordinate Pre-Employment Transition Services (Pre-ETS). Many state VR agencies have developed policies to define and address the provision of Pre-ETS in their jurisdictions. Given the recent establishment of WIOA and its associated regulations, little is known about state Pre-ETS policies.
OBJECTIVE: The objective of this study was to analyze state Pre-ETS policies for the purpose of understanding the impact of WIOA and Pre-ETS on students and youth with disabilities, as well as on professional practice.
METHODS: Content analysis was used to examine 38 state Pre-ETS policies.
RESULTS: Results revealed similarities and differences across states with regard to how and to what extent state policies addressed Pre-ETS requirements outlined in federal WIOA policy.
CONCLUSION: This paper offers an analysis of state Pre-ETS policies, making recommendations for research, policy, and practice. Findings provided an understanding of how Pre-ETS are operationalized in policy, which forms the basis for how they will be delivered in practice.

Keywords: WIOA, Pre-Employment Transition Services, vocational rehabilitation, content analysis

1. Introduction

In July 2014, the Workforce Innovation and Opportunity Act (WIOA) was passed by Congress with a bipartisan majority, establishing new workforce initiatives for state vocational rehabilitation (VR) agencies. WIOA is the first legislative reform of the public workforce system [i.e., "a network of federal, state, and local offices that function to support economic expansion and develop the talent of our nation's workforce"] (U.S. Department of Labor, 2017, para. 1) in fifteen years, amending the

Rehabilitation Act of 1998 and other related legislation (WIOA Fact Sheet-Final Rules, n.d.). WIOA was written to "strengthen and improve our nation's public workforce system" by funding state and local workforce initiatives that provide a variety of job training and related services to youth and adults (WIOA, 2014). This legislation fundamentally transformed the public workforce system by emphasizing coordination of services and sharing of resources among a dozen programs serving approximately 20 million Americans each year (WIOA Fact Sheet-Final Rules, n.d.).

To achieve its goal of improving the nation's public workforce system, WIOA was structured around six objectives. First, the overarching focus of the law was to increase success in the labor market,

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particularly for people with barriers to employment. Second, WIOA promoted the alignment of workforce investment, education, and economic development systems to support a comprehensive, accessible, and high-quality workforce development system in the United States. The third objective centered on improving the quality and labor market relevance of workforce investment, education, and economic development efforts to provide U.S. workers with the skills and credentials necessary to secure and advance in employment with family-sustaining wages as well as providing employers with the skilled workers that are needed to succeed in a global economy. Promoting improvement in the structure and delivery of services through the U.S. workforce development system to better address the employment and skill needs of workers, job seekers, and employers was the focal point of the fourth objective. The fifth objective focused on increasing the prosperity of workers and employers in the United States, the economic growth of communities, regions, and states, and the global competitiveness of the United States. The sixth, and final, objective of WIOA related to workforce investment activities designed to increase the employment, retention, and earnings of participants, and increase attainment of recognized postsecondary credentials by participants, and as a result, improve the quality of the workforce, reduce welfare dependency, increase economic self-sufficiency, meet the skill requirements of employers, and enhance productivity and competitiveness nationwide (WIOA, 2014).

To realize these objectives, specific services to be provided to people with barriers to employment were outlined. One group specifically targeted by WIOA was students and youth with disabilities. Title IV of the law describes a specific set of services-Pre-Employment Transition Services (Pre-ETS)-to be offered to this group. Pre-ETS are intended to improve and expand VR services for students and youth with disabilities, facilitating their transition from educational services to postsecondary life. According to Title IV, 15% of each state's federal funding allocation for VR services must be designated for Pre-ETS to eligible and potentially eligible students and youth with disabilities (WIOA, 2014). Through these provisions, WIOA established a new emphasis on providing services to students and youth with disabilities, ensuring that these young people have opportunities to receive the training and supports necessary to achieve competitive integrated employment.

Federal WIOA policy (WIOA, 2014) addressed Pre-ETS in four ways. First, it identified who qualifies by specifying that Pre-ETS is targeted to students and youth with disabilities who are *eligible and potentially eligible* for VR services. Next, required Pre-ETS services were described. These included job exploration counseling, work-based learning experiences, post-secondary education counseling, workplace readiness training, and instruction in self-advocacy. Additionally, authorized activities that VR agencies can implement with surplus funds to improve the transition of students with disabilities from school to postsecondary education or employment were established. Finally, coordination responsibilities in which VR counselors must engage to promote and provide Pre-ETS were outlined.

WIOA's mandate for Pre-ETS led to changes in the ways that VR agencies work with students and youth with disabilities. Most notably, the federal WIOA policy significantly changed eligibility requirements for transition services available from VR. In the past, only students and youth who had applied and been deemed eligible for VR could access transition services through that agency. As a result of WIOA, VR agencies must now serve students and youth with disabilities who are *potentially* eligible for VR services, substantially increasing the number of youth participants (Miller, Sevak & Honeycutt, 2018). Additionally, federal WIOA policy has expanded the role of VR counselors throughout the transition process. Previous iterations of this legislation mandated the coordination of services between VR and education agencies (Oertle & O'Leary, 2017). However, until the recent authorization of WIOA, the level of involvement of VR agencies with schools and students with disabilities varied widely (Honeycutt, Thompkins, Bardos, & Stern, 2015). Changes in eligibility requirements and involvement of VR counselors are especially noteworthy. Research findings have consistently confirmed that earlier and increased involvement of VR professionals is associated with improved post-secondary outcomes for students and youth with disabilities (e.g., Agran, Cain & Cavin, 2002; Brewer et al., 2011; Lindstrom, Kahn & Lindsey, 2013; Oertle & Trach, 2007).

2. Purpose

Federal WIOA policy and its associated regulations have outlined general expectations regarding the provision of Pre-ETS, including an understanding
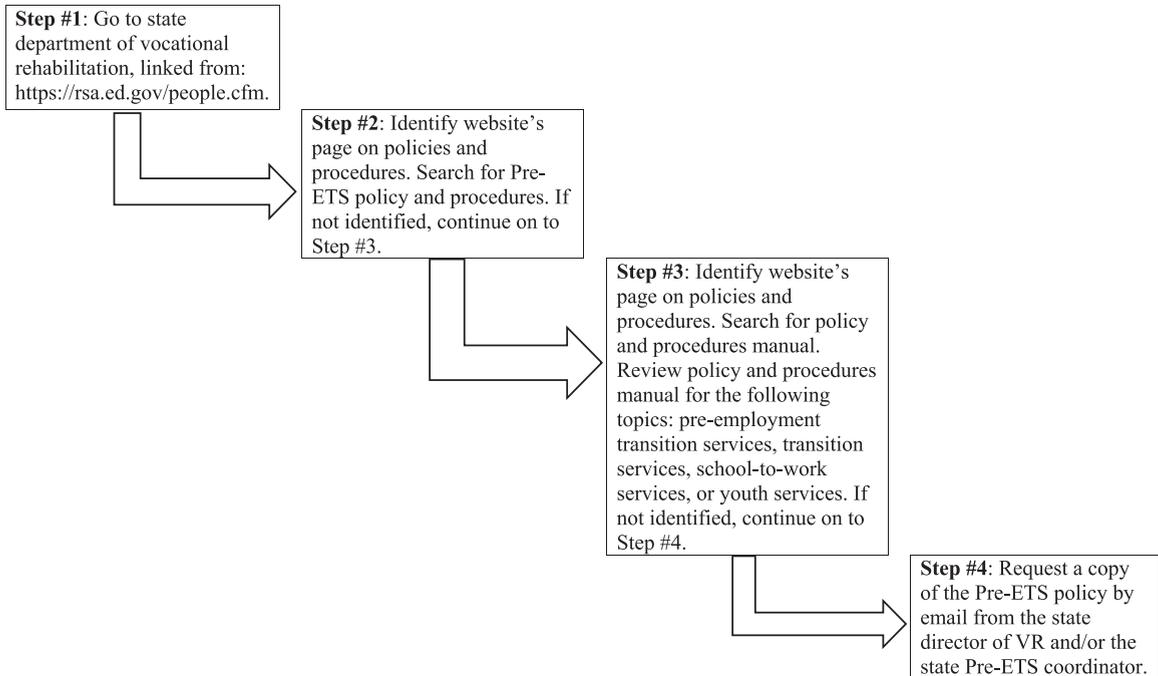
Step #1: Go to state department of vocational rehabilitation, linked from: https://rsa.ed.gov/people.cfm.

Step #2: Identify website's page on policies and procedures. Search for Pre-ETS policy and procedures. If not identified, continue on to Step #3.

Step #3: Identify website's page on policies and procedures. Search for policy and procedures manual. Review policy and procedures manual for the following topics: pre-employment transition services, transition services, school-to-work services, or youth services. If not identified, continue on to Step #4.

Step #4: Request a copy of the Pre-ETS policy by email from the state director of VR and/or the state Pre-ETS coordinator.

Fig. 1. Website Search Logic.

of target populations, required services, authorized activities, and coordination responsibilities. However, states retain the authority to determine how Pre-ETS are offered and implemented within their jurisdictions. Given this flexibility, as well as the relative recency of WIOA and its associated regulations, little is known about how states are conceptualizing Pre-ETS and their implementation. The current study was undertaken to further understanding of this topic by reviewing state Pre-ETS policies with regard to content and quality. The following research questions guided our investigation:

1. Do state Pre-ETS policies address the requirements outlined in the federal WIOA policy?
2. How do state Pre-ETS policies address the requirements outlined in the federal WIOA policy?

3. Method

3.1. Policy identification

We employed a comprehensive electronic search between September 2018 and November 2018 to identify all state Pre-ETS policies. A specific logic, detailed in Fig. 1, guided our search process. First,

we visited each state's VR website where we looked for their policies and procedures webpage. After identifying the policies and procedures webpage, we attempted to identify a policy addressing Pre-ETS, transition services, school-to-work services, or youth services. For those states where a standalone policy was not found, we continued reviewing the website for the state's general policies and procedures manual. If a policies and procedures manual was identified, we reviewed it for a section addressing Pre-ETS, transition services, school-to-work services, or youth services. When none of the aforementioned steps led us to the state's Pre-ETS policy, we used the website's search bar feature to locate a state's policies and procedures manual. If a Pre-ETS policy was not available on a state's website, the first author sent an email to the state's Director of VR. Email addresses were obtained from the "People and Offices" webpage of the Rehabilitation Services Administration website. Additionally, the first author sent an email to the state's Pre-ETS Coordinator if their contact information was listed on the state's VR website.

Upon completing these activities, we identified a total of 38 state Pre-ETS policies. Thirty policies were available electronically. Eight state VR Directors provided the first author with a paper copy of their state's Pre-ETS policy. Five state VR Directors indicated that their state had not yet developed a

Target Population	• Students with disabilities • Youth with disabilities
Required Services	• Job exploration counseling • Work-based learning experiences • Post-secondary education counseling • Workplace readiness training • Instruction in self-advocacy
Authorized Activities	• Implementing effective strategies to increase independent living, community inclusion, and competative employment • Developing/improving strategies to promote independent living, participation in postecondary education, and obtaining, retaining, and advancing in competitve employment • Providing instruction to VR counselors, school transition personnel, and others • Disseminating information about innovative, effective, and efficeint approaches for Pre-ETS • Coordinating activites with transition swervices provided by LEAs under IDEA • Applying evidence-based findings to improve policy, procedures, practice, and prepartion of personnel to achieve the goals of Pre-ETS • Develoing model transition demonstration projects • Establishing or supporting multi-state regional partnerships involving states, LEAs, DSUs, DD agenices, private businesses, and others to acheive Pre-ETS goals • Disseminating information and strateiges to improve the transiton to post-secondary activities for unserved or underserved populations
Coordination Responsibilities	• Auxillary aids and accommodations • Outreach and collaboration responsibiliittes • Referral processes • Financial responsibiliy • Order of selection

Fig. 2. Coding Categories for Research Question #1.

Pre-ETS policy, while four state VR Directors reported that their policy was under review and not publicly available. Four states did not respond to the email request, and therefore no information is available in these states.

3.2. Content analysis

Content analysis was used to examine state Pre-ETS policies. In keeping with a directed approach to content analysis, we used inductive and deductive category development (Hsieh & Shannon, 2005). Deductive category development was used to address the study's first research question: Do state Pre-ETS policies address the requirements outlined in the federal WIOA policy? Guided by federal WIOA policy, we identified Pre-ETS requirements and used these requirements as initial coding categories. These coding categories are listed in Fig. 2. Initial coding categories were then applied to each state's Pre-ETS policy. If a coding category was included in the state's policy, it was coded as "1" and all descriptive content was copied from the state Pre-ETS policy and pasted into the coding sheet. If the coding category was not addressed, it was coded as "0." Consistent

with an inductive approach to coding category development, an additional category was added as new insights emerged from coding state Pre-ETS policies (Kondracki, Wellman, & Armundson, 2002). The additional coding category that emerged was order of selection. Although not mentioned in the federal WIOA policy, nine states addressed the provision of Pre-ETS during a "wait list" or order of selection. Inductive category development was used to address the study's second research question: How do state Pre-ETS policies address the requirements outlined in the federal WIOA policy? We reviewed descriptive content to develop coding categories. Then, we applied these coding categories to each set of descriptive information taken from state Pre-ETS policies. These coding categories are described in detail throughout this paper's results' section.

3.3. Interrater agreement

The first and third authors established interrater agreement for 11 of the 38 state Pre-ETS policies. Prior to interrater coding, the first author trained the third author on the codebooks, reviewing the federal WIOA policy, as well as coding categories

and descriptions of each coding category. After training, the first and third authors coded for the presence/absence of coding categories in the state Pre-ETS policies separately. Descriptive content taken from state Pre-ETS polices was coded as well. The first and third authors met to review their work. Agreements and disagreements were recorded and used to calculate interrater agreement (i.e., number of exact agreements, divided by agreements plus disagreements). The mean interrater agreement was 86.8% for presence/absence and 84.09% for descriptive content. Discussion between the first and third authors was used to establish consensus on disagreements (i.e., negotiate the final codes) (Graneheim & Lundman, 2004).

4. Results

We analyzed thirty-eight state Pre-ETS policies. The majority ($n = 31$) of states included their Pre-ETS policies within an overarching state policies and procedures manual. Seven states maintained a separate Pre-ETS policy. Detailed information regarding the presence/absence of coding criteria in each state Pre-ETS policy can be found in Table 1. Information regarding the analysis of descriptive content can be found below.

4.1. Target population

Every state policy included a definition of a target population or the population eligible to receive Pre-ETS. The majority of states ($n = 34$) identified students with disabilities as a target population. In defining this target population, states addressed age, disability, and/or educational placement. Thirty-three state policies addressed age. To be eligible for Pre-ETS, students with disabilities must meet their state's age requirements for IDEA-mandated transition services. In most states, the earliest a student can receive IDEA-mandated transition services is 14 or 16 years of age, while the latest is 21 years of age. Thirty-one state policies addressed disability. To be eligible for Pre-ETS, students with disabilities must meet eligibility criteria for IDEA or Section 504 of the Rehabilitation Act services. Thirty-one states addressed educational placement. Students with disabilities must document their enrollment in an education program, which could include secondary schools, home schools, alternative school programs, post-secondary education programs, adult basic education programs, or accredited certification programs.

In addition to identifying students with disabilities, nineteen states also identified youth with disabilities as a target population. Youth with disabilities are distinct from students with disabilities, as they are not enrolled in an education program. In defining this target population, states addressed age and educational placement. Eighteen state policies addressed age, with descriptions varying widely amongst states. Ten state policies addressed educational placement, stating that youth with disabilities are not required to be enrolled in an educational placement.

As a part of target population descriptions, state policies defined eligible and potentially eligible students and youth. Eight state policies defined eligible students and youth as those who are eligible for VR services. Fifteen state policies defined potentially eligible students and youth as "those who have not applied or been determined eligible for VR services" (e.g., Maryland, 2017, p. 2). One state, Arizona, provided exclusion criteria by outlining circumstances in which Pre-ETS would not be provided. These circumstances were: (1) The student completed Pre-ETS, chose not to apply for VR and their record of service was closed; (2) The student applied for VR, was determined eligible and placed on a waitlist prior to the receipt of any Pre-ETS (if the student started Pre-ETS prior to being placed on a waitlist, they may continue to receive Pre-ETS); (3) The student applied for VR and was determined ineligible; and (4) The student is no longer in need of Pre-ETS in order to access competitive and integrated employment (Arizona, 2018).

4.2. Required services

Thirty-seven of 38 state Pre-ETS policies included a description of required services, including: (1) job exploration counseling, (2) work-based learning experiences, (3) post-secondary education counseling, (4) workplace readiness training, and (5) instruction in self-advocacy. To support descriptions of required services, fourteen state policies explained the purpose of these services. For instance, Arizona (2018) described required services as an "early start to job exploration" (p. 236), while Louisiana (n.d.) indicated that required services "promote movement from school to post-school activities leading to competitive integrated employment" (S. Morel, personal communication, October 30, 2018). In addition to defining the purpose of required services, Kansas

Table 1
Summary of coding criteria in state Pre-ETS policies

	Alabama	Alaska	Arizona	Arkansas	California	Colorado	Connecticut	Georgia	Idaho	Illinois	Iowa	Kansas	Kentucky	Louisiana	Maryland	Michigan	Minnesota	Missouri	Montana
Target Population	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Instruction in Self-Advocacy	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X
Workplace Readiness Training	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X
Job Exploration Counseling	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X
Work-Based Learning Experiences	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Post-Secondary Education Counseling	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X	X	X
Authorized Activity #1	X				X								X						
Authorized Activity #2	X				X								X						
Authorized Activity #3	X				X								X						
Authorized Activity #4	X				X								X						
Authorized Activity #5	X				X								X						
Authorized Activity #6	X				X								X						
Authorized Activity #7	X				X								X						
Authorized Activity #8	X				X								X						
Authorized Activity #9	X				X								X						
Auxiliary Aids & Accommodations		X	X						X				X	X	X				
Outreach & Collaboration Responsibilities	X	X			X	X	X	X	X		X	X	X	X	X		X	X	X
Referral Process	X		X	X			X						X		X				
Financial Responsibility														X	X				
Order of Selection			X										X				X		X

	Nebraska	Nevada	New Hampshire	New Jersey	New Mexico	North Carolina	North Dakota	Ohio	Rhode Island	South Carolina	Tennessee	Texas	Utah	Vermont	Virginia	Washington	West Virginia	Wisconsin	Wyoming
Target Population	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Instruction in Self-Advocacy	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Workplace Readiness Training	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Job Exploration Counseling	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Work-Based Learning Experiences	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Post-Secondary Education Counseling	X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Authorized Activity #1				X	X					X	X	X		X	X				
Authorized Activity #2				X	X					X	X	X		X	X				
Authorized Activity #3				X	X					X	X	X		X	X				
Authorized Activity #4				X	X					X	X	X		X	X				
Authorized Activity #5				X	X					X	X	X		X	X				
Authorized Activity #6				X	X					X	X	X		X	X				
Authorized Activity #7				X	X					X	X	X		X	X				
Authorized Activity #8				X	X					X	X	X		X	X				
Authorized Activity #9				X	X					X	X	X		X	X				
Auxiliary Aids & Accommodations	X	X			X	X	X	X			X							X	X
Outreach & Collaboration Responsibilities		X		X	X	X	X			X	X			X				X	X
Referral Process	X				X	X	X		X		X			X			X	X	X
Financial Responsibility		X			X													X	
Order of Selection			X				X		X				X	X					

Table 2
Job exploration counseling: Activities and services

Activities	Services
Opportunities such as:	Counseling addressing:
• Benefits evaluations	• In-demand industry sectors
• Psychological evaluations	• In-demand occupations
• Vocational and interest inventories	• Non-traditional employment
• Work strategy assessments	• Provision of local labor market
• Career exploration	information and composition
• Labor market surveys	• Career pathways
• Cover letters	
• Developing career portfolios	
• Informational interviews	
• Job applications	
• Job shadows	
• Resume building	

(n.d.) outlined potential constraints to the provision of required services, indicating that "not every service will be provided to each student, depending on his/her needs, interests and informed choice and depending on the capacity of the program within the available funding" (E. VanVleck, personal communication, November 13, 2018).

4.2.1. Job exploration counseling

Thirty-six state policies defined job exploration counseling. Fifteen states included an exact copy of the federal WIOA policy's definition of job exploration counseling. Six state policies described the purpose of job exploration counseling. For example, Montana (n.d.) indicated that job exploration counseling is "meant to provide students with a variety of opportunities to gain information about careers, the skills needed for different jobs and to uncover personal career interests" (T. Hogan, personal communication, November 13, 2018), whereas in Arkansas (n.d.) it was "designed to determine career direction" and "intended to foster motivation, consideration of opportunities and informed decision-making" (p. 303). Eighteen state policies identified specific activities and services related to job exploration counseling (see Table 2). Seven states identified which of these activities and services were intended to be addressed in an individual setting, while four states identified which activities and services were designed to be addressed in a group setting. Eight state policies identified the location of job exploration counseling. Identified locations included: classroom setting ($n = 8$), community setting ($n = 8$), and individual counseling sessions ($n = 1$). One state, Louisiana (n.d.), specified the personnel responsible for providing job exploration counseling by indicating "job exploration counseling will be provided

by the rehabilitation counselor" (S. Morel, personal communication, October 30, 2018).

4.2.2. Work-based learning experiences

Thirty-seven state policies addressed work-based learning experiences, with thirteen states including an exact copy of the federal WIOA policy's definition. Three state policies described the purpose of work-based learning experiences. For example, Montana (n.d.) described work-based learning experiences as "an educational approach or instructional method that uses community workplaces to provide students with the knowledge and skills that will help them connect school experiences to real-life work activities and future career opportunities" (T. Hogan, personal communication, November 13, 2018). In comparison, work-based learning experiences in North Dakota (2017) were described as "use(ing) the workplace or realistic work situations to provide students with the knowledge and skills that will help them connect school to future career opportunities" (p. 2). Twenty-one state policies listed activities related to work-based learning experiences (see Table 3). Five states identified which activities are to be addressed in an individual setting or a group setting. Twenty-two states identified the location of work-based learning experiences, explaining that these experiences "must be provided in an integrated setting in the community to the maximum extent possible" (e.g., see North Carolina, 2018, p. 267). Additionally, five states addressed the personnel responsible for the provision of work-based learning experiences, although identified personnel varied widely. For example, in Illinois, work-based learning experiences are arranged by the local education agency and provided by the state VR agency. In Louisiana (n.d.), certain work-based learning

Table 3
Work-based learning experiences: Activities

Activities
Opportunities such as:
• After school work opportunities
• Apprenticeships
• Career mentoring opportunities
• Career related competitions
• Fellowships
• In-school work opportunities
• Informational interviews
• Internships
• Job shadowing
• Job try-outs
• Mock interviews
• On-the-job trainings
• Parts of the Project SEARCH Program
• Practicums
• Service-learning opportunities
• Short-term employment
• Simulated workplace experience
• Student-led enterprises
• Summer work opportunities
• Supported short-term paid work experiences
• Tours with companies
• Volunteering
• Work-based learning programs
• Work-site tours

experiences are coordinated by Community Rehabilitation Programs, while others are organized by VR counselors. In Washington (2018), work-based learning experiences are "typically vendor provided" (p. 474).

State policies' descriptions of work-based learning experiences touched on additional topics not addressed in the descriptions of other required services. Four state policies outlined procedures to take should a student require additional work-based learning experiences outside of those provided through Pre-ETS, explaining that the student "would need to apply and be determined eligible for VR services and develop and have an approved individualized plan for employment" (e.g., North Carolina, 2018, p. 267). One state, Arkansas (n.d.), detailed the length of work-based learning experiences, stating that "the number of student work experiences hours shall not exceed 20 hours per week per school year and/or the number of hours per work experience, as set forth by the Department of Labor" (p. 303). Two state policies addressed the topic of compensation. For example, Arkansas (n.d.) specified that "students may receive a stipend through Arkansas Rehabilitation Services for time worked during a work experience; however, all stipends must be paid at minimum wage and adhere to Pre-ETS procedures" (p. 303). Also, it was explained in Montana's (n.d.) policy

that "wages are to be paid at no less than minimum wage" (T. Hogan, personal communication, November 13, 2018). Potential constraints to the provision of work-based learning experiences were addressed by Kansas (n.d.), which indicated that "Rehabilitation Services will emphasize paid work-based learning experiences for qualifying students with disabilities. However, the number of paid work-based learning experiences in any given community are limited by funding, provider capacity, and available worksites" (E. VanVleck, personal communication, November 13, 2018). Kansas' policy also outlined a number of additional eligibility criteria, beyond those where were outlined in their target population description, that students and youth with disabilities must meet to participate in work-based learning experiences.

4.2.3. Post-secondary education counseling

Thirty-six states policies addressed post-secondary education counseling. The exact wording provided in the federal WIOA policy definition of post-secondary education counseling was included in the policies of 15 of these states. Twenty-one state policies listed specific skills, activities, and services related to post-secondary education counseling (see Table 4). Five states identified which skills, activities, and services needed to be addressed in an individual setting or a group setting. One state, Louisiana (n.d.), addressed the personnel responsible for the provision of post-secondary education counseling by stating "counseling on post-secondary activities will be provided by the VR Counselor" (S. Morel, personal communication, October 30, 2018).

4.2.4. Workplace readiness training

Thirty-six state policies defined workplace readiness training. Fifteen states included the same definition of workplace readiness training presented in WIOA. Thirteen state policies described the purpose of workplace readiness training, explaining that this training is meant "to develop social skills and independent living skills necessary for employment" (e.g., North Carolina, 2018, p. 267). Nineteen states listed specific skills, activities, and services related to workplace readiness training (see Table 5). The skills, activities, and services to be addressed in an individual setting or a group setting were specified in three state policies. Eleven states identified the location of workplace readiness training, including: any setting ($n = 1$), classroom setting ($n = 2$), educational

Table 4
Post-secondary education counseling: Skills, activities, and services

Skills	Activities	Services
Developing competencies in: • Self-advocacy skills for the purpose of identifying accommodations and services in an educational program	Opportunities such as: • Academic program research • Academic assessments • Career pathways related workshops • Completing the Free Application for Federal Student Aid • Connecting to community resources • Developing course schedules • Discussing reasonable accommodations • Informing students about post-secondary training programs • Postsecondary institution tours • Identifying admission tests accommodations • Familiarizing students with education and vocational laws • Postsecondary preparation classes • Providing information on academic curricula necessary to earn specific degrees • Researching career and postsecondary options • Researching scholarship opportunities	Counseling addressing: • Advocating for needed accommodations and services in postsecondary setting • Financial aid • Opportunities for enrollment in comprehensive transition or postsecondary educational programs

Table 5
Workplace readiness training: Skills, activities, and services

Skills	Activities	Services
Developing competencies in: • Communication skills • Employability skills • Financial literacy • Independent living skills • Interpersonal skills • Job-seeking skills • Orientation and mobility skills • Social skills	Opportunities such as: • Connect with America Job Centers • Connect with community resources • Independent living assessments • Job readiness programs • Life Skills Training • On-the-job evaluation • Orientation and mobility training • PEERS • Transportation training • WHY TRY	Counseling addressing: • Benefits planning • Community awareness • Employment friendly social media practices • Financial literacy • Soft skills • Technological savvy for the workplace

setting ($n = 5$), community setting ($n = 5$), simulated work setting ($n = 1$), real work setting ($n = 1$), and in conjunction with a work-based learning experience ($n = 2$). Additionally, three states addressed the personnel responsible for the provision of workplace readiness training. For instance, Iowa (n.d.) indicated that workplace readiness training should be coordinated with the local education agency. In contrast, Louisiana (n.d.) stated that workplace readiness training should be provided by a rehabilitation counselor or a Community Rehabilitation Program.

4.2.5. Instruction in self-advocacy

Thirty-six state policies defined instruction in self-advocacy, with twelve states adopting the same language presented in the federal government's WIOA policy. Twenty-four states listed specific skills, activities, and services related to instruction in self-advocacy (see Table 6). Five states identified which skills, activities, and services are to be addressed in individual or group settings. One state, Wisconsin (2018), identified the location of instruction in self-advocacy by noting that "instruction may be conducted in generalized classroom settings or as an arrangement of individual opportunities" (p. 4). Two state policies addressed the personnel responsible for the provision of instruction in self-advocacy: Wyoming named VR counselors/staff, school personnel, and other agencies, while Washington named DVR staff and vendor providers.

Table 6
Instruction in self-advocacy: Skills, activities, and services

Skills	Activities	Services
Developing competencies in:	Opportunities such as:	Counseling addressing:
• Communication skills	• Informational interviews	• Decision-making
• Decision-making	• Learning about rights and responsibilities	• Disability disclosure
• Disability disclosure	• Learning to request accommodations, services, or supports	• Goal setting
• Disability understanding	• Mentoring with education staff, employers, boards, associations, or organizations in integrated community settings	• Intrinsic motivation
• Evaluating options	• Participating in youth leadership activities	• Rights, responsibilities & accepting help
• Goal setting	• Peer mentoring from individuals with disabilities working in competitive integrated employment	• Requesting accommodations
• Identifying accommodations	• Volunteering for boards	• Self-advocacy skills
• Independent Living Skills		
• Knowledge of self		
• Leadership skills		
• Requesting & utilizing accommodations		
• Self-determination		

4.3. Authorized activities

According to federal WIOA policy, funds remaining after the provision of required services may be used to implement authorized activities. Ten states addressed authorized activities in their policies by providing an exact replication of the federal WIOA policy's definition. Authorized activities are listed in Fig. 2. Although no state policies provided detailed descriptions of authorized activities, six states addressed the provision of authorized activities in general. The purpose of authorized activities was explained in five state policies. In four policies, authorized activities were described as a means of "improv(ing) the transition of students with a disability from school to postsecondary education or an employment outcome" (e.g., see Connecticut, 2018, p. 30). California (n.d.) clarified that authorized activities "improve the effectiveness, capacity, and network of the service delivery system" and "expand and improve California's infrastructure for pre-employment transition services" (p. 2). Additionally, five state policies explicitly addressed funding, explaining that authorized activities are to be paid for using "funds available and remaining after the provision of required activities" (e.g., see Tennessee, n.d., p. 4). North Carolina (2018) was the only state where responsible personnel and procedures for providing authorized activities were explicitly identified.

4.4. Coordination responsibilities

Besides describing required services and authorized activities, several states included descriptions of coordination responsibilities, including auxiliary aids and accommodations, outreach and collaboration responsibilities, referral processes, financial responsibility, and order of selection guidelines. Coordination responsibilities are described below.

4.4.1. Auxiliary aids and accommodations

Fifteen states had policies that clarified the purpose of auxiliary aids and accommodations, but the clarifications were not consistent across states. For instance, Maryland's (2017) policy indicated that "no qualified student with a disability is denied the benefit of pre-employment transition services on the basis of the individual's disability" (p. 4). Arizona (2018) indicated that auxiliary aids and accommodations are "necessary to enable a student to access or participate in pre-employment transition services" (p. 237-238). Of the ten states with policies that listed allowable auxiliary aids and accommodations, six of them also specified prohibited auxiliary aids and accommodations. A detailed list of allowable and prohibited auxiliary aids and accommodations are shown in Table 7. Seven state policies acknowledged financial responsibility for auxiliary aids and accommodations, but six state policies asserted that VR would cover the cost of auxiliary aids and accommodations "when no other public entity is required to provide such aid or service" (e.g., see Maryland, 2017, p. 4). One state, Nebraska (n.d.), disclosed that assistive technology would not be purchased by VR for a student in Pre-ETS. Another state, Tennessee (n.d.), identified the need to "coordinate with the local schools to determine which auxiliary aids and services that meet ADA and Section 504 accommoda-

Table 7
Auxiliary aids and accommodations

Allowed auxiliary aids and accommodations	Prohibited auxiliary aids and accommodations
• Amplifiers • Assistive listening devices • Assistive listening systems • Audio recordings • Brailed materials and displays • Closed caption decoders • Exchange of written notes • Interpreter services • Large print materials • Note-takers • Optical readers • Qualified interpreters • Qualified readers • Real-time computer-aided transcription • Screen magnification software • Screen reader • Secondary auditory programs • Support Services Provider • Taped texts • Telephones compatible with hearing aids • Text telephone • Videophones • Written materials	• Attendant care or other services of a personal nature • Home or vehicle modifications • Individually-prescribed assistive technology • Personal devices (e.g., computers, laptops, tablets, etc.) • Prescribed devices (e.g., eyeglasses, hearing aids, wheelchairs) • Readers for personal use or study

tions the school should provide" (P. Knisley, personal communication, October 30, 2018). Kansas, Tennessee, and Wisconsin specified that students with disabilities with sensory and communication disorders were the intended recipients of auxiliary aids and accommodations.

4.4.2. Outreach and collaboration responsibilities

Twenty-seven state policies outlined outreach and collaboration responsibilities. Thirteen states addressed the purpose of outreach and collaboration responsibilities. For example, Maryland (2017) requires that outreach and collaboration activities support "cooperative working relationships" (p. 6), whereas Colorado (2017) described these activities as a means of "identify(ing) those who are in need of pre-employment transition services" (p. 138). Twenty-four state policies detailed allowable collaboration activities, including: attending individualized education program meetings for students with disabilities ($n = 24$), attending person-centered planning meetings ($n = 18$), and working with local workforce development boards, one-stop centers, and employers to develop work opportunities ($n = 18$). Fifteen state policies also addressed the need to work with schools to coordinate and ensure the provision of Pre-ETS as a part of coordination activities. Two state policies specifically identified the need for schools to "continue to be responsible for providing

a free and appropriate public education to include transition services required under IDEA" (e.g., see Maryland, 2017, p. 7). Five state policies outlined allowable outreach activities. Allowable outreach activities included: informing education staff, students, and families about (1) the purpose of VR, (2) eligibility requirements, (3) application procedures, and (4) the scope of services that may be available to students and youth with disabilities. Ten state policies specifically addressed VR Counselors' participation in "other events" as a part of their outreach and collaboration responsibilities. Descriptions indicated that VR Counselors should attend student-related events, such as career fairs, transition fairs, and school-based agency events, as well as education-related events, such as education staff meetings, transition community of practice meetings, and interagency transition team meetings. Table 8 provides a detailed list of outreach and collaboration responsibilities.

In addition to addressing the purpose of outreach and collaboration responsibilities, 18 state policies identified agencies and/or personnel responsible for outreach and collaboration. The personnel that are identified included VR managers, VR counselors, Pre-ETS counselors, and VR staff designated to serve students with disabilities. The agencies identified included state education agencies, local education agencies, post-secondary education

Table 8
Outreach and collaboration responsibilities

Outreach responsibilities	Collaboration responsibilities
• Inform education staff, students, youth, and families about the purpose of the vocational rehabilitation program • Inform education staff, students, youth, and families about DVR eligibility requirements • Inform education staff, students, youth, and families about application procedures • Inform education staff, students, youth, and families about the scope of services that may be available to students and youth with disabilities • Provide LEAs with the necessary forms and templates for required documentation • Provide statewide or regional Transition Coordinators to work with LEAs to coordinate identify students and implement Pre-ETS • Send written notice to principals and LEA directors and principals regarding the availability of Pre-ETS for eligible and potentially students with disabilities and the process to request these services • Work with LEAs to identify students with disabilities and potentially eligible students that may benefit from the delivery of Pre-ETS	• Assign DVR Counselors as liaisons and/or points of contact for each public high school • Attend parent nights, education staff meetings, school-based agency events, career fairs, local youth councils, or interagency transition teams • Attend person-centered planning meetings for students with disabilities receiving services under title XIX of the Social Security Act • Attend transition advisory council meetings and parent information sessions • Collaborate with schools to coordinate and ensure the provision of transition and pre-employment transition services. • Educate school staff on VR eligibility and priority category requirements to ensure that all appropriate students are referred to VR • Encourage referral sources to refer students with disabilities for Pre-ETS and to check on the status of these referrals • Obtain appropriate school records to document a student's disability • Participate in Individualized Education Program meetings for both eligible and potentially eligible students • Provide information about the timeline and application process for VR services • Work with local workforce centers and employers to develop work-based learning experiences for students with disabilities

programs, state-operated programs, workforce development programs, youth-oriented agencies, and other vocational service providers.

4.4.3. Referral process

Sixteen state policies described the process of referring students and youth with disabilities for Pre-ETS. Fourteen state policies identified individuals who should make Pre-ETS referrals. Designated individuals included: students and youth with disabilities, families, guardians, special educators, guidance counselors, school psychologists, speech-language pathologists, school administrators, foster care service providers, juvenile justice staff, community counselors, community agency personnel, and other interested persons. Wyoming and Colorado took a different approach, indicating that "referrals should be a collaborative decision between education and DVR" (Colorado, 2017, p. 150; Wyoming, 2017, p. 97).

Besides identifying who should make Pre-ETS referrals, state polices also addressed procedures for making Pre-ETS referrals. Six state policies outlined modes of referral, including: online referral forms, paper referral forms, and phone calls. Nine state policies detailed procedures, which varied widely from state to state. Two state policies outlined procedures for local education agencies and personnel and

non-school staff. Five state policies described procedures for new referrals, while two policies listed steps to take when a Pre-ETS referral is made for a student with an open VR case. Finally, three state policies addressed procedures for closing a Pre-ETS referral.

4.4.4. Financial responsibility

Five state policies described financial responsibility for Pre-ETS. Four state policies addressed the application of the financial need policy and family contribution, stating the "the financial need policy and the possibility of a family contribution will not apply when the student participates in pre-employment transition services, or the student requires reasonable accommodations/auxiliary aids and other necessary support services to participate" (e.g., see Maryland, 2017, p. 11). West Virginia's (2018) policy outlined the financial responsibility of all involved agencies, including VR and state and local education agencies.

4.4.5. Order of selection

Nine states outlined guidelines for providing Pre-ETS during a "wait list" or order of selection. Guidelines addressed students and youth with disabilities who: (1) received Pre-ETS before application for traditional VR services, and (2) are eligible for Pre-ETS upon application for traditional VR services.

Seven state policies explained that students and youth with disabilities receiving Pre-ETS before applying and being determined eligible for traditional VR services will continue to receive Pre-ETS despite an order of selection wait list. Five states indicated that a student or youth with disabilities who is not receiving Pre-ETS when the eligibility determination is made and who is placed on an order of selection wait list will be subject to the wait list for all services, including Pre-ETS.

5. Discussion

The purpose of this content analysis was to understand how state policies are addressing Pre-ETS requirements outlined by federal WIOA policy. To accomplish this, we analyzed 38 state Pre-ETS policies. Findings from this analysis revealed patterns across state policies, and provided insight into ways in which Pre-ETS, required by the federal WIOA policy, are implemented in practice.

5.1. Limitations

Certain factors may have limited the findings of this content analysis. Primarily, the study's findings were impacted by the available sample of state Pre-ETS policies. Although we had access to 75% of state Pre-ETS policies, we did not have access to policies from every state. As a result, findings were limited to the content of the policies in the sample. Having access to every state's policy, as well as that of the District of Columbia, would have provided a more comprehensive response to the study's research questions. Additionally, the study's findings were impacted by the sole focus of the analysis on written policies specific to Pre-ETS. Policy is influenced by a myriad of formal and informal policy documents (e.g., legislation, regulations, executive orders, service definitions, provider qualifications, and funding structures and rates) that are unique to different state contexts (Butterworth, Christensen, & Flippo, 2017). It is likely that guiding documents affecting the provision of Pre-ETS were excluded from this analysis.

5.2. Do state Pre-ETS policies address the requirements outlined in the federal WIOA policy?

The results of our content analysis revealed that state Pre-ETS policies address the requirements out-

lined in the federal WIOA policy to varying degrees. Overwhelmingly, states addressed target populations. In fact, all state policy's examined identified and defined target populations. This was the only requirement addressed by all 38 state policies. States also consistently addressed required Pre-ETS services. Thirty-six of 38 state policies identified and defined each of the five required services. One state addressed just one of the required services, while the remaining states did not address any required services. Only ten states acknowledged authorized activities within their policies. Notably, over 70% ($n = 27$) of states addressed outreach and collaboration responsibilities. This stands in sharp contrast to states' descriptions of other coordination responsibilities. A modest number of states outlined procedures for referrals ($n = 16$), as well as for providing auxiliary aids and accommodations ($n = 15$). However, very few states addressed financial responsibilities ($n = 5$) or order of selection ($n = 9$).

5.3. How do state Pre-ETS policies address the requirements outlined in the federal WIOA policy?

The ways in which states address Pre-ETS requirements outlined in the WIOA varied considerably. Differences in descriptions existed between state policies, as well as within state policies. Despite these variations, specific themes emerged from each of the four requirements, including: target population, required services, authorized activities, and coordination responsibilities. These themes are discussed in the following sections.

5.4. Target population

All 38 states examined identified and defined target populations within their policies. Primarily, descriptions addressed students with disabilities, with 34 states addressing this group. In describing students with disabilities, states frequently addressed variables related to age, disability, and educational placement. Additionally, a modest number ($n = 19$) defined youth with disabilities. In addressing youth with disabilities, states frequently defined age and educational placement, but did not address disability. Finally, some states defined the concepts of eligible ($n = 8$) and potentially eligible ($n = 15$).

5.5. Required services

Of all the included descriptive content, states' descriptions of required services were the most robust. Thirty-six of 38 states identified and defined each of the five required services within their state policy. In defining required services, state policies consistently addressed: purpose, skills/activities/services, group and individual services, location of services, and responsible personnel. The purpose of required services was addressed in the descriptions of job exploration counseling, work-based learning experiences, and workplace readiness training. Skills, activities, and services associated with each required service, as well as their associated settings (i.e. group settings or individual settings), were addressed in the description of all five required services. The location of required services was addressed in descriptions of job exploration counseling, work-based learning experiences, workplace readiness training, and instruction in self-advocacy. Personnel responsible for the provision of required services was addressed in the descriptions of all five required services. Although state policies consistently addressed the topics of purpose, skills/activities/services, group or individual services, location of services, and responsible personnel, the number of states addressing each topic varied widely. Most notably, very few states described location of services and responsible personnel.

5.6. Authorized activities

Descriptions of authorized activities were vague, both in federal WIOA policy as well as in the state policies. Only ten states addressed authorized activities within their Pre-ETS policies. Of the states addressing authorized activities, none provided detailed descriptions. Rather, they included exact replications of the descriptions from the federal WIOA policy. As a result, little is known about the implementation of authorized activities.

It is possible that this level of guidance is impacting states' ability to implement authorized activities. In a survey of state VR personnel, none reported moving beyond providing required services to providing authorized activities (United States Government Accountability Office, 2018). This lack of provision cannot, in most cases, be attributed to inadequate funding, as only 21 states reported using the full amount of federal grant funds reserved for Pre-ETS for students with disabilities for fiscal year 2016

(United States Government Accountability Office, 2018). Rather, states reported spending about $357 million out of $465 million funds reserved for Pre-ETS services in fiscal year 2016 (United States Government Accountability Office, 2018). In other words, there were funds remaining that could have been applied to the provision of authorized activities. It appears that states would benefit from additional guidance to develop their policies and practices regarding the implementation of authorized activities to come into alignment with the intent of the WIOA.

5.7. Coordination responsibilities

Descriptions of coordination responsibilities varied widely. Fifteen states addressed auxiliary aids and accommodations. Descriptions centered around the purpose of the services, as well as identifying allowable auxiliary aids and accommodations. To a lesser extent, descriptions addressed intended recipients of and financial responsibility for auxiliary aids and accommodations. Sixteen states addressed referral procedures, focusing primarily on individuals responsible for making referrals. To a lesser degree, states described methods or ways of making these referrals. Only five states provided descriptions of financial responsibility. The majority of descriptions focused on VR rules that do not apply to the provision of Pre-ETS; namely, rules pertaining to financial need and family contribution. Only one state identified financially responsible stakeholders and outlined their specific responsibilities. Similarly, descriptions of order of selection were very limited. Included descriptions centered around what procedures to follow when a student or youth with disabilities applies for traditional VR services. Of all of the coordination responsibility descriptions, states provided the most robust descriptions of outreach and collaboration responsibilities. Most notably, states described the purpose of outreach and collaboration responsibilities, in addition to what responsibilities are, who is responsible, and how responsibilities should be carried out.

Again, it appears that states could benefit from additional guidance surrounding coordination responsibilities. In interviews with state VR personnel, participants reported experiencing specific coordination challenges, such as difficulty determining each agency's responsibilities for providing Pre-ETS, difficulty obtaining data needed to identify and provide services to students, and difficulty determining which agency will pay for which services

(United States Government Accountability Office, 2018). Additionally, in a survey of state VR personnel representing 34 state VR agencies, over half reported that additional assistance on coordinating with state educational agencies would be useful (United States Government Accountability Office, 2018). Moreover, in the same survey, VR personnel indicated that they had challenges finding students, reporting that statewide information on students and youth with disabilities was not readily available (United States Government Accountability Office, 2018). Without this information, it may be difficult for states to identify eligible and potentially eligible participants.

5.8. Implications for practice

Results from this study are relevant to multiple stakeholders. Primarily, results can be used by state-level VR personnel in evaluating their state's Pre-ETS policy. This study's findings provide a context by which VR personnel can identify their state policy's relative strengths and weaknesses, as well as identify areas and ideas for improvement. Next, results from this study will be useful to VR personnel as they work with students and youth with disabilities, as well as with other key stakeholders. For example, local VR personnel can utilize results addressing required services to identify additional strategies, services, and activities to incorporate into their practice, enhancing their work with students and youth with disabilities. Furthermore, they can use results addressing outreach and collaboration responsibilities to determine additional strategies to engage key stakeholders, such as local education agencies. Finally, this study's findings can inform the work of educators by enhancing their understanding of Pre-ETS, an important service available to many of their students.

5.9. Implications for research

Findings from this study provide a common understanding of how Pre-ETS are operationalized in state policies and offer insights into areas in need of additional research. Here, we recommend two potential areas of focus for future research. First, researchers should consider analyzing other documents and resources guiding the provision of Pre-ETS, such as formal and informal policy documents. As mentioned in the limitations section, multiple documents drive the provision of Pre-ETS, and findings based on a more comprehensive review of policy documents would provide a more complete picture. In particu-

lar, researchers should consider analyzing state VR agencies' interagency agreements with state education agencies, a document mandated by the federal WIOA policy. Second, researchers should employ other methodologies to learn about the conceptualization and implementation of Pre-ETS across states. For example, researchers could interview or survey state-level and local-level VR personnel about the provision of Pre-ETS in their states. A particular focus should be placed on understanding those requirements that are not well-defined by the current study, such as authorized activities and coordination responsibilities.

6. Conclusion

Despite the recent establishment of the WIOA and its associated regulations, there has been limited inquiry into states' conceptualization of Pre-ETS. In an attempt to shed light on this topic, we analyzed thirty-eight state Pre-ETS policies to gain an understanding of how state policies are addressing Pre-ETS requirements outlined in federal WIOA policy. Results identified similarities and differences across states with regard to how, and to what extent, state policies addressed Pre-ETS requirements outlined in federal WIOA policy. Further, our findings provided an understanding of how Pre-ETS are operationalized in policy, which forms the basis for how they will be delivered in practice.

Conflict of interest

The authors declare no potential conflicts of interest with respect to the research, authorship, and/or publication of this article.

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