



From Participation to Impact

A Look at Vocational
Rehabilitation and
Pre-Employment
Transition Services

BY

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Background and Context

Supporting and preparing individuals with learning disabilities (LD) for meaningful employment is critical to their success in adulthood. However, there are stark employment disparities between people with disabilities and those without: 41.6% people with disabilities are in the labor force compared to 78.5% of people without disabilities.¹ According to a national survey of over 1,300 young adults with learning disabilities, over half reported difficulty obtaining a job because of their LD (54%), and nearly half reported difficulty maintaining employment because of their LD (48%).² Many of these young adults reported struggling with difficulties related to their LD as they navigated the transition to the workforce including managing stress and coping skills, sustaining focus, and staying organized. Although transition services are intended to support students to navigate this period effectively, many students with learning disabilities may be unaware that such programming exists or is relevant to their needs. Findings from the same survey indicate that 54% of young adults with LD were aware of Pre-Employment Transition Services programs available at their schools, but only 10% reported participating. Developing a clearer understanding of both the barriers that limit participation in these programs and the outcomes associated with engagement is essential to supporting the successful integration of young adults with learning disabilities into the workforce.

About this Report and the Data

In 2024, the National Center for Learning Disabilities updated its mission to explicitly address barriers in workplaces and communities. A [2024 letter](#) from NCLD's leadership shared principles for workforce inclusion.

This project aimed to better understand how individuals with learning disabilities access, engage with, and benefit from federally funded Pre-Employment Transition Services (Pre-ETS) and Vocational Rehabilitation (VR) programs. NCLD commissioned Dr. Hadas Eidelman to analyze Pre-ETS and VR program data from the 2022 program year (July 2022–June 2023).³ The analysis focused on three research areas. Full findings are available upon request.

1. Access: Who gets VR and Pre-ETS and how?
2. Services: What and how many services do individuals receive?
3. Benefits: What do individuals gain from receiving VR and Pre-ETS programs?

¹ Kessler Foundation, 2025

² Rodrigo, S. A., Wong, L. N., Harris, S. L., Wilson, S. E., Malone, A. S., Stelitano, L., Fuller, N., Kubatzky, L., Gage, N. A., Blackorby, J., & LeBoyd, N. (2024). *The State of Learning Disabilities: Navigating the transition to adulthood*. National Center for Learning Disabilities.

³ The data reported in this paper come from the RSA-911 case services report from PY 2022 which was obtained by request from the U.S. Department of Education. Full findings are available upon request.



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Part I: An Overview of the Vocational Rehabilitation (VR) and Pre-Employment Transition Services (Pre-ETS) Programs

Bridging Gaps to Support Employment: VR and Pre-ETS

Workforce development and transition services for individuals with disabilities are not a new concept. The Vocational Rehabilitation (VR) program (defined in the glossary in Appendix A) dates back more than a century, originating in 1918 as the first federal program designed to support disabled veterans in securing employment after World War I. The goal of VR is to assist individuals with disabilities in obtaining and maintaining employment opportunities by addressing barriers they may face due to their disability. The VR program is a vehicle for expanding workforce readiness, employment, and independence for individuals with disabilities by providing services and an individualized plan of employment. See Appendix B for a full list of VR services individuals may receive.

Supporting individuals with disabilities to succeed in employment must begin well before they exit the education system. This period is known as transition. The term transition services was first defined in law in 1990 in a reauthorization of the Individuals with Disabilities Education Act (IDEA) and was strengthened in subsequent reauthorization. Despite these efforts, gaps in access to postsecondary education and employment persist for students with disabilities, indicating the importance of effectively leveraging the Vocational Rehabilitation (VR) program to support this age group. Pre-Employment Transition Services (Pre-ETS) were developed to enhance and strengthen transition services provided under IDEA. The 2014 reauthorization of the Workforce Innovation and Opportunity Act (WIOA) requires VR agencies to set aside 15% of their funds to Pre-ETS. Pre-ETS are specifically designed for individuals in K-12 or postsecondary settings with disabilities that need specific support in transitioning out of the K-12 system



with the goal of engaging them in employment preparation prior to leaving school. Pre-ETS includes a specific set of activities: work-based learning experiences, job exploration counseling, counseling on postsecondary education opportunities, workplace readiness training, instruction and self-advocacy. These services are designed to supplement, not replace, transition services under IDEA.

VR is required to work with workforce development groups (e.g. community organizations, advocacy groups), employers, and schools. This can include VR providers attending Individualized Education Program (IEP) meetings when invited, building relationships that support program development, and expanding access to resources that create work-based opportunities for students with disabilities. They serve as a support for local educational agencies, designated State units, developmental disability agencies, and private businesses. Interagency collaboration between VR agencies and school districts must be highlighted through an agreement within state plans that discuss what the roles and responsibilities are of each stakeholder group.

How does Vocational Rehabilitation work? What are the federal, state, and local roles?		
FEDERAL	STATE	LOCAL
<p>Passes laws that govern the VR program (i.e., <i>Workforce Innovation and Opportunity Act – WIOA</i>).</p> <p>Authorizes the VR program through Title IV of WIOA.</p> <p>Provides 79% of total VR program funding.</p> <p>Oversees VR nationally through the Rehabilitation Services Administration (RSA).</p> <p>Requires 15% be set-aside for Pre-Employment Transition Services.</p>	<p>Operate at least one state Vocational Rehabilitation agency (some states have one agency for general VR and one for blind services).</p> <p>Provide 21% of matching funds.</p> <p>Develop state-level policies to align with federal requirements.</p> <p>Manage program performance and reporting.</p>	<p>Local VR offices and contracted providers deliver direct services to jobseekers with disabilities.</p> <p>VR counselors and providers help individuals with career planning, training, job placement, and supports, including Pre-Employment Transition Services.</p> <p>Local offices coordinate with:</p> <ul style="list-style-type: none"> • Employers • Workforce development boards • Schools and school districts • Community organizations

The Importance of Competitive Integrated Employment (CIE)

Attaining Competitive Integrated Employment (CIE) is a statutory requirement and the primary goal of VR.⁴ CIE is full time or part time employment for individuals in inclusive work environments alongside their non disabled peers, receiving compensation and benefits compensatory to wages to employees without disabilities and is defined in the Rehabilitation Act, as amended by WIOA.⁵ Individuals not in CIE who are employed may be in sheltered workshops, which are segregated settings typically paying subminimum wages.

Program Funding

States receive federal VR funding through a statutory formula that provides for an increase each year for the program for inflation. Congress blocked this increase in fiscal year (FY) 24, but the increase was restored with FY 25 funding.

In order for states to receive their full allocation under the formula, states must provide matching funds and satisfy maintenance of effort requirements.⁶ States that do not provide sufficient state funding to match their federal allocation must relinquish a portion of their federal allocation. In fiscal year (FY) 25, a minority of states relinquished, or returned, millions of dollars in funding, with 17 state VR agencies relinquishing approximately about \$196.5 million, or about 4.75% of total funds.

⁴ 34 CFR §361.5(c)(32)(ii)

⁵ 34 CFR §361.5(c) (9) (ii)

⁶ Maintenance of Effort (MOE) refers to the requirement that a grant recipient maintain a consistent level of non-federal expenditures from year to year. In the context of VR, the MOE test compares a state's non-federal spending in a given fiscal year to the levels of non-federal expenditures in the two prior fiscal years. Failure to maintain this level of effort generally constitutes a failure to meet MOE requirements, resulting in the U.S. Department of Education reducing the amount of federal funds that the state receives.



Relinquished funds can be redistributed to other states through a reallocation process. FY 25 is the most recent example in which requests for reallocated funds exceeded the amount available. The demand exceeding the supply indicated a need to access funds to provide services for individuals. See Appendix C for more information.

While the law requires states to allocate 15% of their VR funds for Pre-ETS services, the fiscal data has shown that it takes time for states to fulfill that requirement. Since its inception in 2014, states have increased their percentage allocations towards Pre-ETS. In 2021, 23 states spent less than the required 15% on Pre-ETS. In FY 2022, only nine states did not meet the requirement.⁷ As states increase their allocation of VR funding to Pre-ETS, many have been able to expand programming and reach for eligible students. For example, in Iowa, more than 40% of eligible students received services in 2023.⁸

Eligibility for Services

VR agencies have a set client intake process for individuals seeking services for VR and Pre-ETS programs. The eligibility criteria are as follows:

Vocational Rehabilitation

1. Individuals must have a “substantial impediment”* (i.e. have a physical, mental, emotional, or learning disability) that is a barrier to the individual getting and keeping a job.

**Regulations indicate that “impediment” should be interpreted broadly.*

2. Need VR services to get, keep, or regain employment, and be able to benefit from the services.

⁷ Source: U.S. Department of Education. Retrieved from <https://public.tableau.com/app/profile/raisethebar/viz/Pre-EmploymentTransitionFY2021-2022/TransitionServices>

⁸ Meredith Kolodner, *Hundreds of thousands of students are entitled to training and help finding jobs. They don't get it*, The Hechinger Report, February 4, 2025, updated June 10, 2025, <https://hechingerreport.org/hundreds-of-thousands-of-students-are-entitled-to-training-and-help-finding-jobs-they-dont-get-it/>



The application and intake process occurs before an individual can receive services, which includes gathering information on employment status and history, receipt of benefits (i.e. SSI/SSDI), and disability documentation. Assessments may be performed during this process.

If services are limited, individuals with the most significant disabilities are prioritized for receiving services by the VR agency (see explanation on Order of Selection below). The VR agency is still required to provide assessment services to determine eligibility.

After eligibility for VR services is established, a written plan called an Individualized Plan for Employment (IPE) is developed to outline an individual's employment goals and the specific VR services to be provided. The IPE must be developed no more than 90 days from a person's eligibility determination.

A VR agency can deny VR services, in part or in full, if services could be provided elsewhere.

Pre-Employment Transition Services

1. An individual with a disability not younger than the earliest age for the provision of transition services under IDEA (age 14) may not be older than 21 years of age; or if the maximum age of IDEA services is older than 21, the maximum age for services must not extend beyond that set by the state.
2. In a secondary* or postsecondary education program.

**Receiving special education services under IDEA (have an IEP) or have a 504 plan for a disability*

WIOA mandated the Pre-ETS program in 2014 which means that VR agencies must now serve students and youth with disabilities who are potentially eligible, or the criteria above, for VR services in the program, substantially increasing the number of youth participants.

Order of Selection

When VR agencies are unable to serve everyone eligible for services, the agency will operate under "Order of Selection" where they have open and closed priority categories (usually between 3 and 5 categories). In other words, individuals placed within a closed priority category will

be on a waitlist. A state's Order of Selection must "show the order to be followed in selecting eligible individuals for" VR services and provide justification for the plan it selects. The law states that when the agency is unable to serve everyone seeking services, priority must be given to individuals with the most significant disabilities.

States may implement or cease to implement Order of Selection at any time. In November 2025, 13 VR agencies were operating on Order of Selection (three with 0 categories open, eight with 1 category open, and two with 2 categories open). When a state implements Order of Selection it must: 1) do so on a statewide basis, 2) notify all individuals of the priority categories established, their assignment into a priority category, and the right to appeal a category placement, and 3) continue to provide services to those who were already receiving services.





Part II: Findings⁹ and Takeaways

Throughout the findings, we compare key data from both individuals with LD in both programs and individuals without LD (i.e. with other types of disabilities). Comparing individuals with LD to a broad, heterogeneous group of people with other disabilities has several important limitations. The non-LD category often includes individuals with a wide range of disability types and support contexts.

Differences observed between groups may reflect variation in service pathways or program delivery rather than differences in level of need. While NCLD strongly discourages the use or reinforcement of notions that some groups of people with disabilities are “more deserving” or “less in need”, we also recognize that when resources are limited, individuals with more significant disabilities must be prioritized for services because they are subjected to adverse outcomes such as non-CIE employment in sheltered workshops.

These comparisons are included to highlight patterns of similarities and differences and to shed light on why LD is a significant subgroup whose needs must be intentionally addressed by VR and Pre-ETS programs, as well as on patterns that exist for the LD population specifically and for individuals with disabilities as a whole.

Access: Who gets VR and Pre-ETS and how?

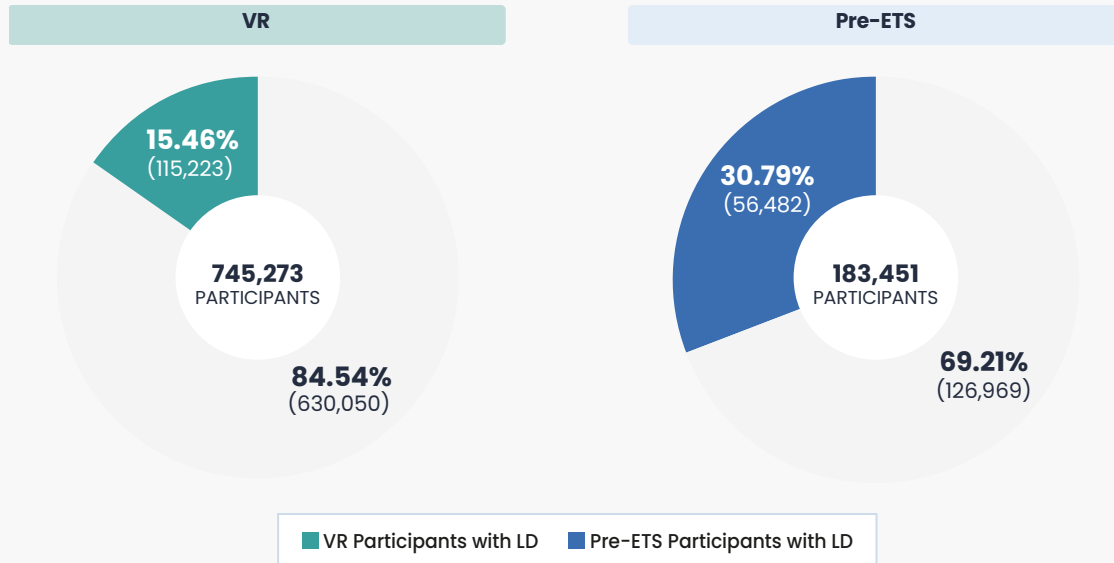
It is essential to analyze information about the individuals who receive supports from VR and Pre-ETS programs to understand their impact.

LD Participation

We examined the share of VR and Pre-ETS participants with LD, compared to other disabilities, to understand if the program is reaching individuals with LD as intended. As Figure 1 shows, a substantial proportion of both VR and Pre-ETS program participants have a learning disability.

⁹ The data reported in this paper come from the RSA-911 case services report from PY 2022 which was obtained by request from the U.S. Department of Education. Full findings are available upon request.

Figure 1: Number and percentage of individuals receiving VR and Pre-ETS with LD.



Dual Participation (Both VR and Pre-ETS)

Twenty percent of all participants in VR were also enrolled in Pre-ETS, while 79% of Pre-ETS participants were also enrolled in VR. This substantial overlap, especially for the Pre-ETS program, might suggest that agencies are not collecting important intake data on all program participants unless they continue into or participate in VR concurrently. This may mean that the Pre-ETS data in RSA-911 underrepresents the true population of individuals receiving services.

Other Characteristics

We examined other characteristics of VR and Pre-ETS participants with and without LD to further explore which students with LD are being reached in programming, compared to other program participants. It is encouraging to see both programs reaching individuals who are impacted by poverty or who are English learners, as those are additional needs that can contribute to barriers to employment. A substantial percentage of individuals identified in the VR assessment process have low levels of literacy which may be due to or compounded by disability-related needs. Low literacy is associated with a range of outcomes, including higher rates of unemployment, incarceration, and poorer health outcomes.

Table 1: Characteristics of Individuals in the VR and Pre-ETS programs

Characteristic	Individuals in the VR program		Individuals in the Pre-ETS program	
	With Other Disabilities	With LD	With Other Disabilities	With LD
Who are also low income	49% (n=325,552)	38% (n=43,542)	30% (n=83,941)	31% (n=17,323)
Who are also English learners	9% (n=53,519)	11% (n=12,256)	8% (n=9,744)	11% (n=5,999)
Who are Basic Skills Deficient or have low literacy ¹⁰	23% (n=145,847)	39% (n=44,375)	35% (n=43,520)	40% (n=22,437)



¹⁰ Defined in § 681.210(c)(3) as (1) Have English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (2) Are unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family, or in society.



Concurrent Educational Enrollment

Many individuals in both VR and Pre-ETS programs are also enrolled in secondary or postsecondary education, especially for Pre-Employment Transition Services.

Figure 2: Enrollment in Secondary or Postsecondary Education While in VR

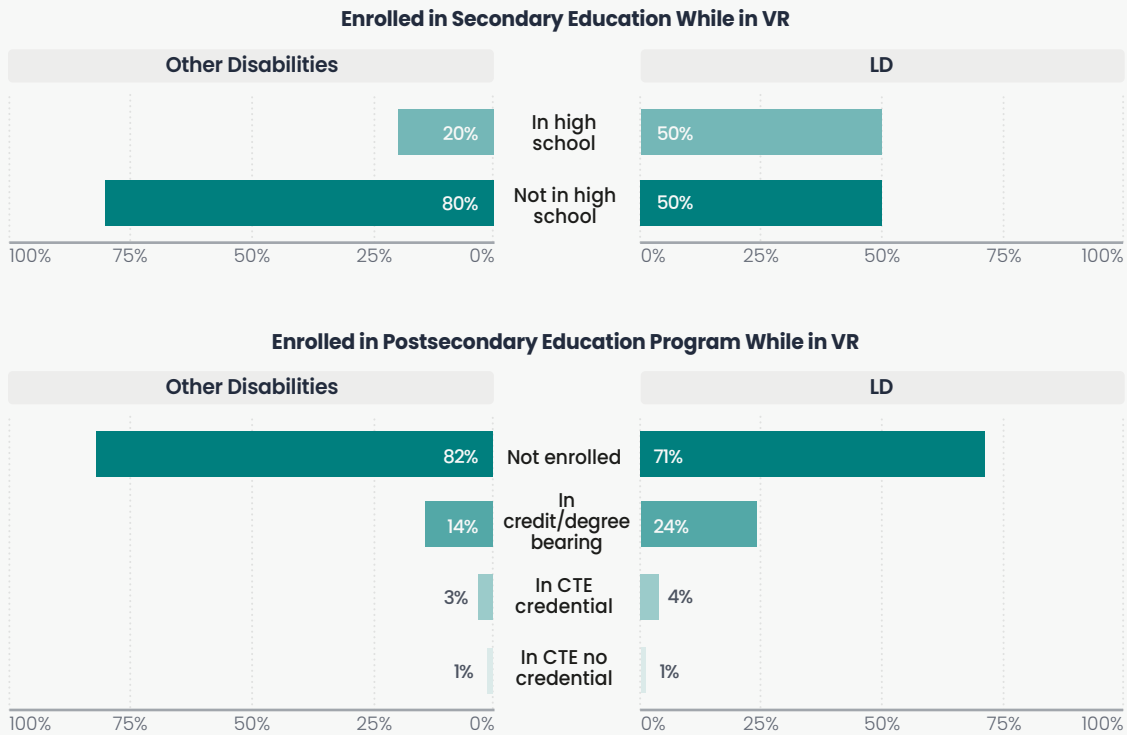
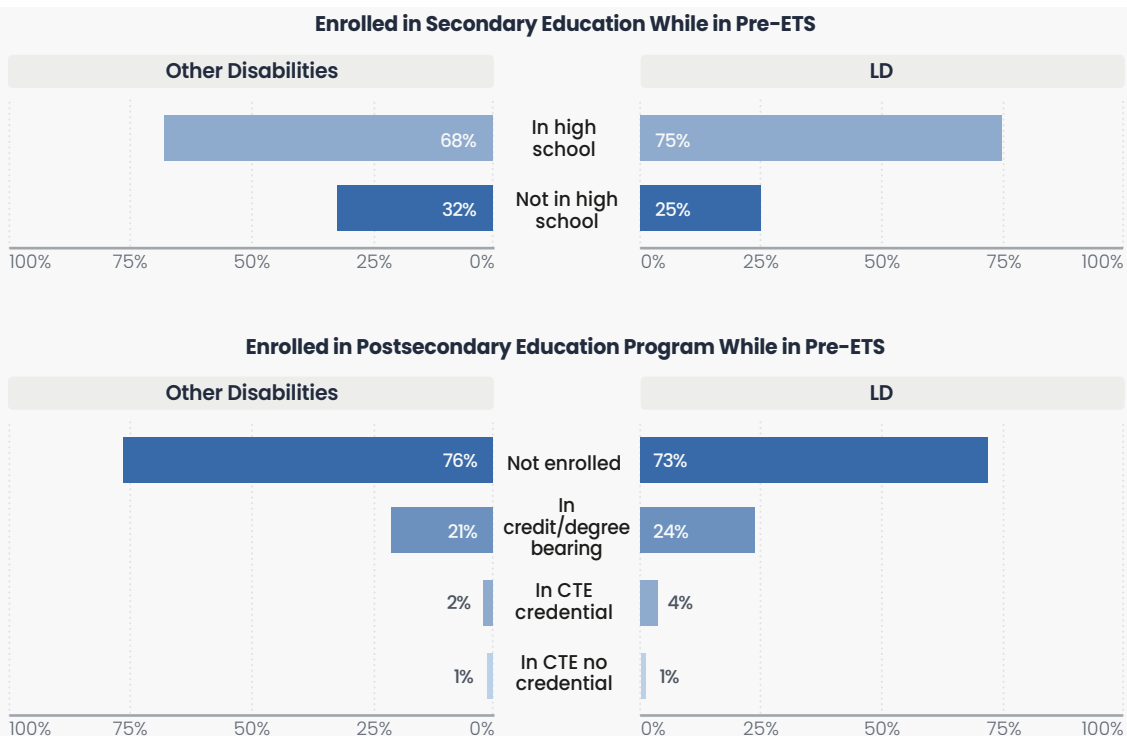


Figure 3: Enrollment in Secondary and Postsecondary Education While in Pre-ETS



Source of Referral

Schools are a significant source of referral across both the Pre-ETS and VR programs. In Pre-ETS, schools account for the majority of referrals (87% of students with LD and 71% of students without LD). In VR, schools are also the leading referral source for individuals with LD (65%) and the second-largest source for individuals without LD (23%). Together, these patterns highlight schools as a consistent and influential referral pathway into both programs. For a complete list of referral sources, each of which accounts for a relatively small share of referrals, see Appendix D.



Figure 4:
Source of Referral for VR Participants

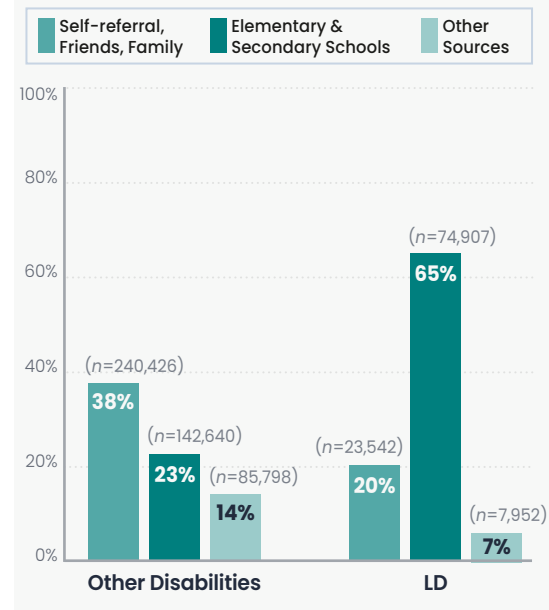
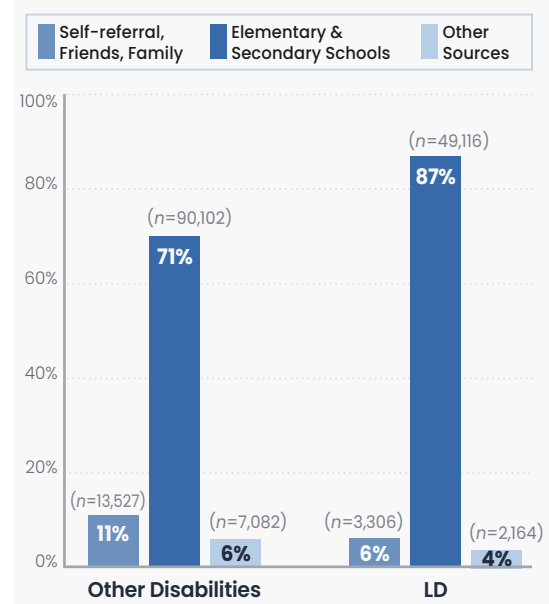


Figure 5:
Source of Referral for Pre-ETS Participants





Key Takeaways About Access

- **Students with LD are participating in Pre-ETS services at rates proportional to their representation in special education.**

Thirty-one percent of students receiving Pre-ETS have LD, which closely approximates their representation in special education (32%).¹¹ Although these populations are not entirely comparable, due to slightly different eligibility criteria for Pre-ETS versus eligibility criteria for special education under IDEA, they provide a general indication that Pre-ETS programs are largely reaching students with LD as intended.

- **While the Pre-ETS program has expanded since its inception, it is not reaching a lot of students who are eligible.**

The Pre-ETS program served 183,451 total students, including 56,482 with LD in PY 2022. In comparison, in that same year, there were an estimated¹² 4.1 million students who were served under IDEA between the ages of 14–21, including 1.3 million students with specific learning disabilities (SLD).¹³ Based on these figures, only roughly 4.4% of the eligible population (IDEA only) for Pre-ETS services are participating in those services. While the law doesn't mandate that Pre-ETS serve all eligible students in the way that IDEA does, this gap suggests that the majority of students are not receiving services through the program and that additional efforts are needed to expand for those who could benefit. Students with 504 plans are eligible for Pre-ETS but constitute a lower proportion compared to the general population, a different analysis found.¹⁴ These findings reflect lack of awareness and capacity issues, not necessarily lack of interest in services and support.

¹¹ National Center for Education Statistics. (n.d.). *Students with disabilities*. U.S. Department of Education. <https://nces.ed.gov/programs/coe/indicator/cgg/students-with-disabilities>

¹² Estimates using IDEA 618 data products on child count educational environments, tables 1 and 9

¹³ SLD is term used in IDEA and one of the 13 categories for special education services.

¹⁴ Whittenburg, H. N., Avellone, L., Taylor, J. P., Park, S., Poppen, M., Rios, Y. C., & Tansey, T. (2024). State-level characteristics and trends in Pre-Employment Transition Service delivery to students with disabilities. *Journal of Vocational Rehabilitation*, 60(2), 185–195.

- **Individuals with LD who receive VR and Pre-ETS services are overwhelmingly students, with schools as the primary referral source.**

These findings demonstrate that schools are effectively serving as a bridge between students with disabilities and transition and workforce development supports, particularly for individuals with LD. Pre-ETS is reaching students with LD primarily while they are still in K-12 settings, aligning with the program’s intent to reach students before they exit high school. In contrast, VR’s LD participants are more evenly split between secondary and postsecondary education. Half of VR participants with LD are still in K-12, compared with only 29% of students with other disabilities, suggesting that students with LD may engage with VR earlier or that schools are more proactive in referring them. On the other hand, access may be largely school-dependent, potentially contributing to uneven participation across states, districts, and schools.





Services: What and how many services do individuals receive?

Vocational Rehabilitation

There are 31 VR services individuals may receive. A full list is found in Appendix B. The most commonly received services by individuals are:

Table 2: Commonly Received VR services

Service	Percentage of Individuals with Other Disabilities	Percentage of Individuals With LD
VR counseling and guidance	75%	81%
Assessment	29%	20%
Job placement assistance	22%	19%
Job search assistance	20%	18%
Information and referral services	13%	17%
Transportation	14%	12%
4-year college and training	6%	8%
2-year college and training	<5%	7%

All VR program participants accessed an average of 2.67 services and individuals with LD accessed an average of 2.39 services. The vast majority (96%) of individuals with and without LD accessed between 1 and 5 different services.



Pre-Employment Transition Services

The law authorizes five services under Pre-ETS, described below. Pre-ETS recipients accessed an average of 2.9 services, but over a quarter of individuals only received one service and about a quarter received all five (see figure 6).

Table 3: Description of Pre-Employment Transition Services

Pre-Employment Transition Service	Description of Service
Job Exploration Counseling	<ul style="list-style-type: none"> • Interest inventories • Current state of the labor market • Identifying interesting career pathways for students • In-demand work industries and occupations
Work-Based Learning Experiences	<ul style="list-style-type: none"> • Job shadowing • Internships • Volunteering • Tours of workplaces
Counseling on Postsecondary Education Opportunities	<ul style="list-style-type: none"> • College fairs and tours • IPSE (Inclusive postsecondary education) resource information
Workplace Readiness Training	<ul style="list-style-type: none"> • Social skills training (soft skills) • Financial literacy
Instruction in Self-Advocacy	<ul style="list-style-type: none"> • Self-determination training • Progress monitoring • Problem solving • Goal developing

Individuals are most likely to receive either one or all five Pre-ETS services (see figure 6). These patterns are the same for individuals with other disabilities. Within the five pre-ETS services, job exploration counseling is the most commonly received service for both individuals with LD and without. Less than half of students are receiving work-based learning.

Figure 6: Number of Services Accessed Per Pre-ETS Service Recipients with LD

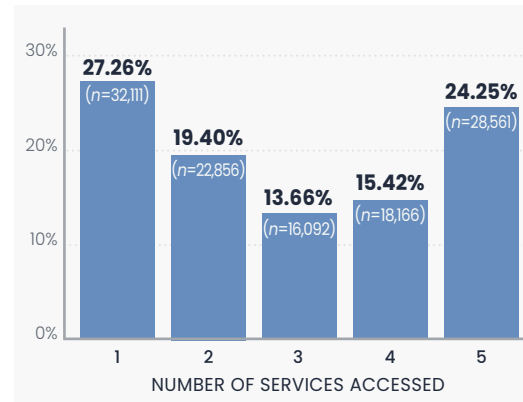
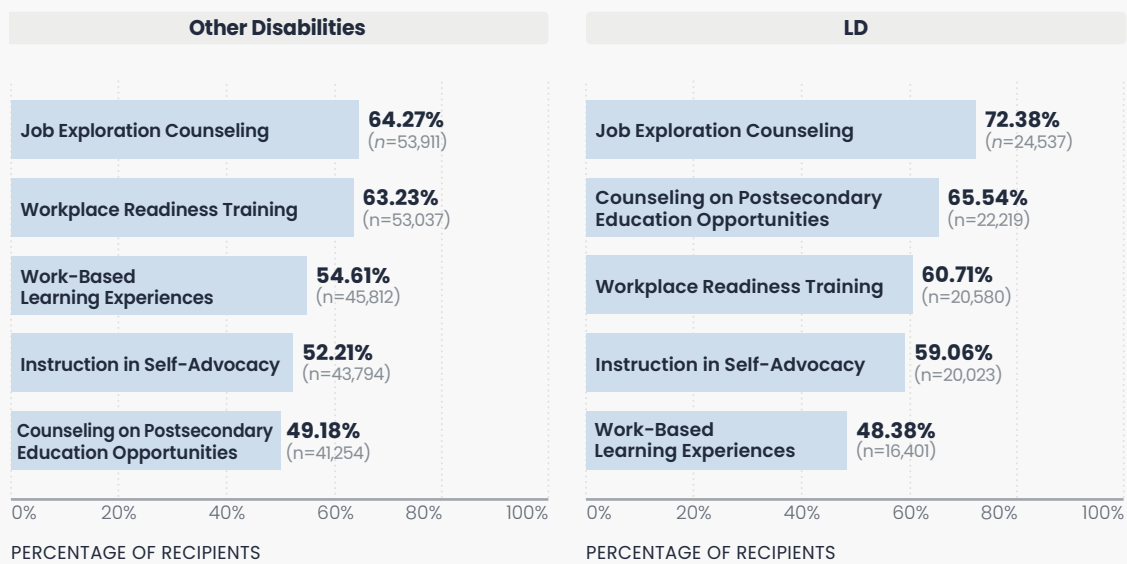


Figure 7: Percentage of Pre-ETS recipients accessing each service



Key Takeaways about Services

- **Some potentially beneficial VR services are underutilized.**

“Diagnosis of impairments” was accessed by about 11% of individuals without LD but less than 5% of individuals with LD. For many individuals, especially with LD, obtaining diagnostic assessments for their disability can be a critical tool in accessing accommodations in postsecondary education and employment settings. Diagnostic tools for LD, such as psychoeducational evaluations, are often costly, ranging from \$1,000 to \$5,000, and many



colleges require these assessments to receive academic accommodations. NCLD has long advocated for legislation such as the Respond, Innovate, Succeed and Empower (RISE) Act to streamline documentation requirements and reduce the need for new assessments; however, leveraging VR for diagnosis and assessment purposes could also help students who want or need updated evaluations.

VR can also help qualified individuals receive financial support for attending college. For example, Best Colleges explains this, though data are lacking on the extent to which costs are covered. However, only 8% of individuals with LD got 4-year college support and 7% got 2-year. This likely suggests either resource constraints of VR agencies, as this is a more costly expenditure and/or that many individuals do not realize that this is a service to access.

- **Access to all of the services under Pre-ETS is very uneven, with individuals most likely to receive either one or all five services.**

Figure 7 shows the percentage of Pre-ETS recipients accessing each service, with job exploration counseling as the most commonly received service for both individuals with LD and without. This indicates that Pre-ETS plays a key role in exposing students to potential career opportunities and supporting alignment with their strengths and interests.

Work-based learning is the least frequently received service for students with LD (48%), while just over half of students with other disabilities are receiving work based learning. This is possibly because work-based learning can require extensive coordination with employer or community partners (i.e. setting up internship placements, job shadowing).

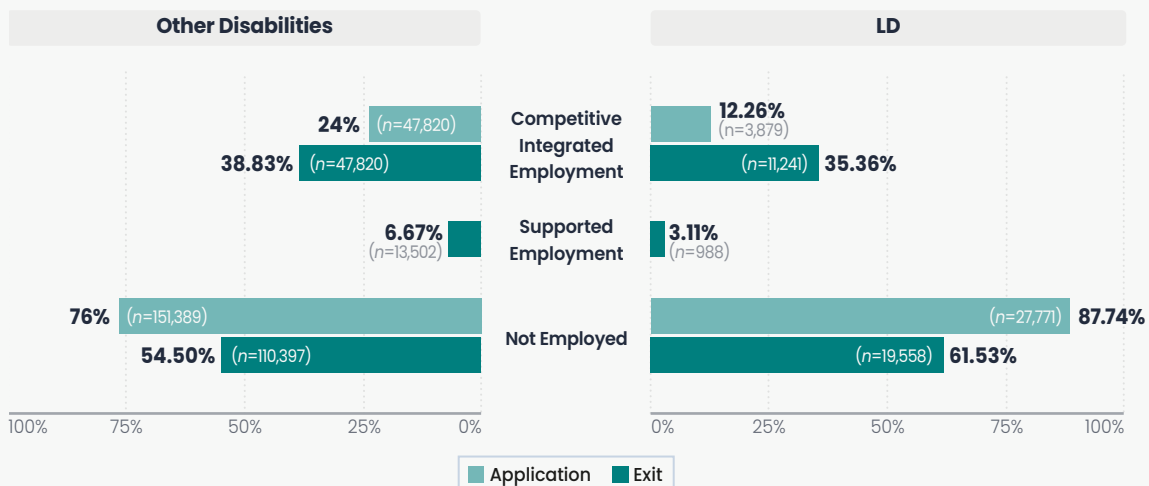
- **Providing more services may be a tradeoff to serving more individuals.**

As described in the explanation about Order of Selection, limited financial resources restrict both VR and Pre-ETS programs from serving all individuals who are eligible. Therefore, while receiving more services by either VR or Pre-ETS may benefit an individual, it may restrict others from accessing services. There is little information available about how VR agencies determine which specific services to provide to an individual and there is the potential for a lot of variability depending on local context or what an individual self-advocates for.

Benefits: What do individuals with LD gain from receiving services from VR and Pre-ETS?

The primary data available to determine the ultimate success of these programs is employment status entering into and exiting the program. There is no information collected through RSA-911 data to demonstrate other tangible benefits to the programs, such as skills gained, access to or entry into a degree or credential-earning program due to the program, or additional information about employment other than whether it is classified as CIE or supported employment (i.e. information on part time or full time, salary or hourly wages). Figure 8 shows the employment rates at application and exit from VR and Figure 9 shows the same for Pre-ETS: there are gains from pre to post program, but not as significant as desired. Research has also shown that VR agencies struggle to incorporate evidence-based approaches into Pre-ETS and transition service,¹⁵ and we know little about the specific policies implementing Pre-ETS (i.e. recruitment strategies) across states, but one analysis suggests a lot of variation in implementation across states.¹⁶

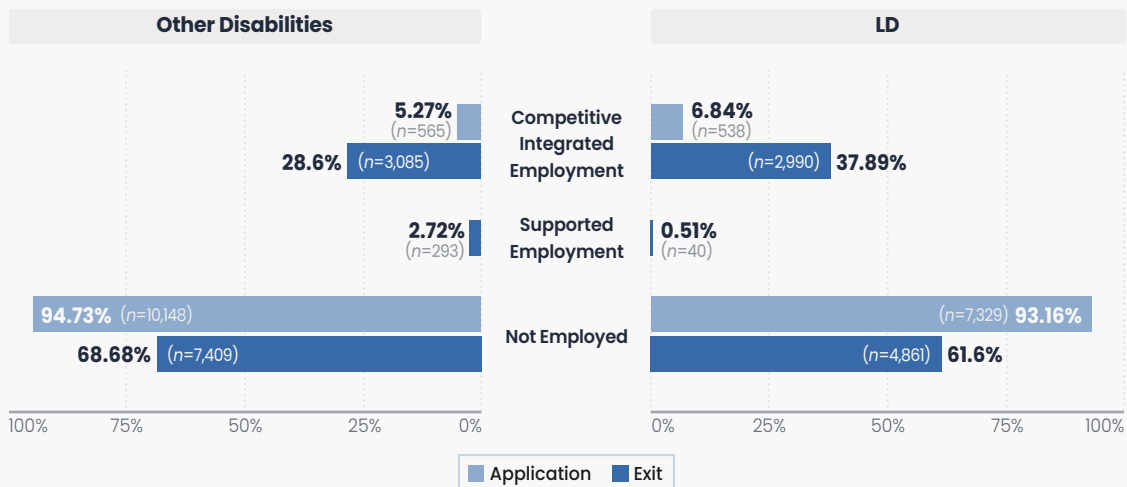
Figure 8: Employment Status at Application and Exit from VR Program



¹⁵ Wehman, P., Tansey, T., Taylor, J. P., Parent-Johnson, W., Whittenburg, H., & Averill, J. (2024). Building a foundation for competitive integrated employment: What does the future hold for Pre-employment Transition Services. *Journal of Vocational Rehabilitation*, 60(2), 263-272.

¹⁶ Whittenburg, H. N., Avellone, L., Taylor, J. P., Park, S., Poppen, M., Rios, Y. C., & Tansey, T. (2024). State-level characteristics and trends in Pre-Employment Transition Service delivery to students with disabilities. *Journal of Vocational Rehabilitation*, 60(2), 185-195.

Figure 9: Employment Status at Application and Exit from Pre-ETS Program



Key Takeaways About Benefits

- **Individuals with LD benefited from both VR and Pre-ETS, resulting in higher employment rates post-program but employment rates remain relatively low overall.**

The employment rate for individuals with LD participating in the VR program increased from 13% at application to 39% at exit. For the Pre-ETS program, 8% of individuals with LD were employed before the program and that percentage increased to 34% at exit. For the Pre-ETS program, individuals generally range in age from 14 to 21, so unemployment upon exit may largely be a function of their age as they may still be enrolled in education or not yet seeking employment because they still reside with family. The VR program exit employment data demonstrate that many individuals remain unemployed. Still, it's important to note that these data are collected immediately at program exit, with no additional follow-ups. Other WIOA programs, such as those in Title I, collect data on individuals' employment status and wages at quarterly intervals up to 1 year after program completion, which might better gauge the program's benefits and success for employment outcomes.

- **Most individuals who are employed after the program attain competitive integrated employment.**

Attaining competitive integrated employment (CIE) is one of the primary goals of VR, and both programs show gains in individuals attaining CIE pre vs. post program participation. The data show that a small percentage of individuals exiting the VR program (7% of individuals without LD, 3% with LD) attain supported employment.¹⁷ Supported employment is viewed as a model to help people with more significant disabilities gain access to employment, with some individualization for the employee but maintaining autonomy and promoting integration. Some disabled workers do need supported employment to attain Competitive Integrated Employment.



¹⁷ 81 FR 55780 § 363.1

Part III: Recommendations for Policy and Practice

For Federal Policymakers

These recommendations for federal policymakers serve to improve the program's implementation and can be achieved without reopening WIOA Title IV for reauthorization, as doing so risks weakening the strong definition and focus on competitive integrated employment.

- **Congress should increase mandatory appropriations for the VR program to ensure states have sufficient resources to deliver robust Pre-ETS.**

The transition from high school to postsecondary education or employment is a pivotal period for youth with disabilities. Once students leave the more structured and individualized supports of the K-12 system, they enter environments with far fewer built-in supports, making early access to work-based learning, job exploration, and self-advocacy skills essential. Increased federal investment would allow VR agencies to expand high-quality Pre-ETS (including more services) without compromising funding for other vital VR services, ensuring that more students with disabilities are prepared to navigate the workforce and succeed in adulthood.

- **The Federal Government should establish national performance indicators on Pre-ETS quality and outcomes, including outreach and identification of eligible individuals. They should also make RSA-911 data publicly available and accessible to stakeholders, and ensure it is accurate.**

This should include data collection on outreach metrics, and require states to set annual outreach targets as access to services is uneven. There are few accountability metrics for Pre-ETS in particular, so requiring states to use the state data reporting process (RSA-911) as an opportunity to understand their strengths and areas for improvement, including comparisons with other states on areas such as work-based learning completion rates, postsecondary education enrollment, CIE outcomes, and self-advocacy or soft skill gains. The RSA-911 data is not currently publicly available and is available only by request, so



analyses are often published in peer-reviewed articles behind paywalls. As previously mentioned, the significant overlap of individuals in Pre-ETS who also enrolled in VR might suggest that states are not sufficiently collecting data on the population receiving Pre-ETS and that there is a need for data quality improvement.

- **A federal focus on work-based learning could improve the provision of and access to high quality experiences.**

Given this is an area that has broad bipartisan support, federal guidance, technical assistance, and investment in research that sheds light on high quality work-based learning opportunities, including coordination between employers, community partners, and schools is imperative.

For State Policymakers and State VR Agencies

Many opportunities for change occur at the state level, as state legislatures and VR agencies can work to improve program implementation.

- **State legislatures should ensure they allocate sufficient funding for VR so it is maximized and not returned through the reallocation process.**

Because the VR program requires a state match, states that do not allocate sufficient funds end up returning roughly 75 cents on the dollar in potential federal support (a significant loss). Failing to invest in VR also means missing an opportunity to help individuals with disabilities prepare for and obtain employment. Fully leveraging these funds is a critical element to building a strong talent pipeline and ultimately strengthening state and local economies.

- **State policymakers must ensure better coordination and alignment with other workforce development services.**

While the VR program is a valuable resource for many with LD, it prioritizes serving individuals with the most significant disabilities when resources are constrained. Title I of WIOA funds other workforce development services and programs, but many of those are not well-equipped to support individuals with LD or other disabilities. State workforce boards and other state agencies should promote strategies to support people with



disabilities (i.e., Universal Design for Learning, knowledge of disability accommodations and other job supports) and develop strategies within other workforce development programs so that VR is not the only option for people with disabilities.

- **Because little is known about Pre-ETS implementation (and if Federal policy recommendation #2 is not implemented), states should establish accountability metrics for the implementation of VR and Pre-ETS programs that are not primarily about spending funds.**

For example, setting and publishing information on annual measurable goals for outreach, individuals served, service quality, provider qualifications or training, and employment outcomes. When a state's VR agency employs Order of Selection, the state should ensure that it is still serving individuals already receiving services sufficiently and that appropriate steps are being taken to move off of Order of Selection.

- **Encourage VR agencies to formalize and strengthen partnerships with public colleges and universities, and with employers.**

This could help increase the number of students who access VR services for disability diagnosis at institutions and leverage VR resources to support college payments. While partnerships with employers are required, it is critical to strengthen them.

For Local Programs and School Districts

Guided by states, local programs and school districts play a critical role in ensuring access to programs especially with community and family outreach.

- **Strengthen and foster VR and school collaboration and coordination.**

For example, offering joint training for special education teachers and administrators, career and technical education staff, and VR providers. Ensure that discussion of VR and Pre-ETS enrollment opportunities is sufficiently included in transition planning for all students with IEPs and 504 plans.

- **Use local data and employ resources to reduce access disparities and improve outreach with a focus on family outreach.**

Data can identify what students are eligible but not yet receiving services, and districts can ensure equitable access across schools in their referral practices. Leveraging resources to improve community-based outreach (i.e. a dedicated parent liaison and an annual information session) could improve knowledge of and access to the program.

For Advocates and Individuals Seeking Services

Advocacy is needed to support other policy recommendations and to help individuals access services they are eligible for.

- **Help to ensure the state is maximizing available federal resources.**

Because many states do relinquish funds, more advocacy is needed to educate state policymakers on the implications of doing so and to ensure that state VR agencies are leveraging available technical assistance from the federal government and membership organizations like the Council of State Administrators of Vocational Rehabilitation.

- **Understand what the federal law requires of both the VR and Pre-ETS programs, including eligibility requirements and available services.**

For individuals seeking services or family members supporting an individual seeking or receiving services, knowing what opportunities are available can help ensure maximum benefit. States have obligations about providing and funding certain services which means that no one is entitled to a specific service or program, but self-advocacy can make a difference in access to services.



Appendix A: Glossary of Key Terms

Competitive Integrated Employment (CIE): Work performed in typical community work settings where individuals with disabilities are paid wages and receive benefits comparable to those of employees without disabilities in similar roles. It is defined in statute and is a goal of Vocational Rehabilitation.

Individualized Education Program (IEP): A legally binding, written document developed by a school team and the student's family that outlines a student's present levels of performance, annual goals, special education services, and supports required by the Individuals with Disabilities Education Act.

Individualized Plan for Employment (IPE): A formal, individualized written plan developed jointly by an eligible individual and a Vocational Rehabilitation counselor that defines the person's employment goal and the specific services and supports needed to achieve that goal.

Individuals with Disabilities Education Act (IDEA): A federal special education law that guarantees eligible students with disabilities access to a free appropriate public education and governs how states and schools provide special education and related services.

Pre-Employment Transition Services (Pre-ETS): A set of required early intervention services provided through Vocational Rehabilitation agencies to help students with disabilities explore careers, develop workplace readiness skills, and prepare for postsecondary education or employment.

Rehabilitation Services Administration (RSA): The federal office currently within the U.S. Department of Education responsible for administering and overseeing Vocational Rehabilitation, independent living programs, and monitoring state compliance with federal requirements.

Section 504 of the Rehabilitation Act/504 Plan: A federal civil rights statute that prohibits disability discrimination and requires schools to provide reasonable accommodations and supports to ensure equal access to educational programs and activities. In schools, a student with a disability who does not have an IEP may have a 504 plan to receive accommodations.



Set-Aside: The statutory funding requirement that obligates state Vocational Rehabilitation agencies to reserve 15% of their federal allotment exclusively for the provision of Pre-Employment Transition Services.

Supported Employment: Helping people with significant disabilities get and keep real jobs in their communities, in regular workplaces (integrated settings) alongside non-disabled workers, with ongoing, customized help like job coaching or training to succeed, even if competitive work was hard to acquire before.

Transition Services: A coordinated, results-oriented set of activities designed to facilitate movement from secondary education to postsecondary education, vocational training, employment, and independent living, based on the student's strengths, preferences, and interests. Transition services are defined in both IDEA and WIOA.

Vocational Rehabilitation (VR): A federally funded program that provides individualized services such as counseling, training, and job placement assistance to help individuals with disabilities prepare for, obtain, and maintain employment.

Workforce Innovation and Opportunity Act (WIOA): A federal statute that governs workforce development systems, including Vocational Rehabilitation programs, and establishes performance accountability standards and service requirements.



Appendix B: List of VR Services

List of VR Services¹⁸

- Assessment
- Basic academic remedial or literacy training
- Benefits counseling
- Customized employment services
- Customized training
- Diagnosis and treatment of impairments
- Disability related services skills training
- Extended services
- 4-year college or university training
- Graduate college or university
- Information and referral services
- Interpreter services
- Job placement assistant
- Job readiness training
- Job search assistance
- Junior or community college training
- Maintenance
- Miscellaneous training
- Occupational or vocational training
- On-the-job training
- Other services
- Personal assistive services
- Randolph-Sheppard Entrepreneurial Training
- Reader services
- Registered apprenticeship training
- Rehabilitation technology
- Short-term job supports
- Supported employment services

¹⁸ Derived from the RSA-911 dataset.



Appendix C: Additional Explanation of VR Funding Process

In the FY 25 reallocation process, \$214.6 million was available and 32 VR agencies requested \$339.3 million. In the past, when the requested reallocation amounts were less than the available funds, Congress included additional authority for the U.S. Department of Education to award competitive grants to states (Disability Innovation Fund).

Appendix D: Source of Referral for VR and Pre-ETS

There are many other sources of referral for VR services,¹⁹ however they account for a minimal number (less than 5%) of all referrals to the program. They include:

- Postsecondary education institutions
- Intellectual and developmental disability agencies
- Service providers
- Mental health providers
- Medical health providers
- Centers for Independent Living
- Adult, Dislocated, and Youth program (WIOA Title I)
- Extended Employer Providers
- Other American Job Centers or Workforce programs
- Adult Education and Family Literacy programs (WIOA Title II)
- Social Security Administration (SSA)
- 14(c) Certificate
- Employers
- Wagner-Peyster (WIOA Title III)
- American Indian VR Services
- Temporary Assistance for Needy Families
- Workers Compensation
- Veteran's Benefits or Health Administration

¹⁹ Derived from the RSA-911 dataset.

