



research brief

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Rehabilitation Research & Training Center



## State VR Agency Counselors' Perceptions of Their Role in Implementing Transition Services Under WIOA

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The Workforce Innovation and Opportunity Act of 2014 significantly modified the way that vocational rehabilitation (VR) services are provided to youth with disabilities, including students who are enrolled in school. Specifically, WIOA required that states reserve 15% of their federal budget for certain services for these youth, with the emphasis being on pre-employment transition services (Pre-ETS) to be offered to all students with disabilities who are eligible or potentially eligible for VR services. This requirement expanded the scope of VR services to this population, and as several recent studies indicate, presented both challenges and opportunities to state vocational rehabilitation agencies (Miller, Sevak, & Honeycutt, 2018; NCD, 2017).

In 2016, Neubert, Luecking, & Fabian (2018) conducted an online survey of state vocational rehabilitation agency (SVRA) counselors regarding perceptions of the importance of and their preparedness to use various transition-related practices for students and youth with disabilities. Although that multi-state survey was not specifically focused on WIOA, several of the survey results, such as respondents' acknowledgement of the need for additional training and preparation in delivering Pre-ETS led to the design of a follow-up qualitative study, reported in this brief, to specifically focus on state vocational rehabilitation agency (SVRA) counselor perceptions of their implementation experiences in the delivery of Pre-ETS. The purpose of this qualitative interview study is to report on our findings regarding implementation issues in delivering VR services to students with disabilities under WIOA from the perspective of a sample of state vocational rehabilitation agency counselors.

## Methods

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This study reports on the results of telephone interviews with 27 VR counselors in seven state VR agencies. We drew our sample from an original list of 13 SVRAs that responded to an online survey study (Neubert et al., 2018), by soliciting their willingness to participate in a brief telephone interview. We contacted each of the 47 potential participants in the seven states and obtained 28 consents; one of whom was dropped as he no longer served a transitioning youth caseload. The three authors arranged and conducted each of the 27 telephone interviews, which lasted about 15-20 minutes.

### Instrument & Data Analysis

Instrument: After reviewing the results of the online survey (Neubert et al., 2018), we developed a follow-up questionnaire specifically focused on the delivery of Pre-ETS to students under WIOA. Since our original online survey was launched prior to the final implementation of WIOA regulations, the follow-up questionnaire provided an opportunity to drill down regarding implementation issues specific to WIOA and Pre-ETS from the perspectives of vocational rehabilitation counselors in state VR agencies. A draft of the follow-up questionnaire was sent to experts in the field of transition who eliminated some of the items and consolidated others. The draft was then reviewed by two state agency vocational rehabilitation counselors; resulting in a telephone survey that included four items regarding their background and role, and eight open-ended questions focusing their experiences in implementation of WIOA and Pre-ETS. Table 1 displays the eight substantive protocol questions, and indicates the ones that are the focus of this information Brief.

**Table 1. Interview Protocol for Follow-Up Interview Study of SVRA Counselors**

1. Has either WIOA or your involvement in delivering Pre-ETS services changed your role as a VR counselor?
2. If you are involved in authorizing or delivering Pre-ETS services, which one of the five mandated activities you predominantly authorize or deliver? describe
  - **Job exploration counseling**
  - **Work based Learning Experiences, (in-school or after school opportunities, experiences outside of traditional school setting, internship)**
  - **Counseling on opportunities for enrollment in comprehensive transition or post-secondary educational programs**
  - **Workplace readiness training to develop social skills and independent living**
  - **Instruction in self-advocacy**
3. Do you or your agency **contract** with other vendors (such as an LEA or CRP) to deliver these services? Which type of agency
4. Has WIOA influenced how you engage in outreach activities with, for example, families, school personnel or AJCs?
5. What are the biggest barriers on your caseload or in your SVRA in the delivery of Pre-ETS to students with disabilities?
6. What strategies have you implemented to address some of these barriers?
7. What type of WIOA or Pre-ETS training you have received or participated in? (webinars, classes, workshops)
8. Given the change in Section 511, on restricting sub minimum wages have you noticed any changes in referrals for students with disabilities you receive from schools?

*Note: **Bold** = Questions Addressed in this Brief*

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Data Analysis: We conducted open-ended interviews over the telephone and took notes for each of the questions. Three researchers then individually coded the questions and the “additional comments” for the 27 participants by themes, quotes, and issues noted. These researchers then meet as a group for two-hour time sessions to talk about their individual codes and to reach consensus about the major codes for each question. This group also summarized responses and themes for each question by participants in each of States to determine if differences in results and themes were noted. The process continued over six sessions until all responses were discussed and counted in some cases, themes were agreed upon, and then summarized.

## Results

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### Participants

Females made up the majority of participants interviewed (52%). Fourteen of the 27 participants were Certified Rehabilitation Counselors (CRC) and the average years working as VR counselor was 12.9 with a range of three to 39 years. The average number of years working with students with disabilities was similar (12.6 years) with the same range.

We asked participants to estimate the percentage of their caseloads comprised of students with disabilities ages 14 - 22. Four of the 27 VR counselors (15%) reported caseloads entirely made up of students with disabilities and five (18%) had caseloads of 50% or more comprised of students with disabilities. The majority of participants (18 or 67%) served both adults and students (with caseloads of 50% or less for students with disabilities).

## Themes

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The following section reviews the major themes related to WIOA implementation issues that were analyzed from the 27 respondents to the telephone interview.

### Theme 1: How WIOA Changed the Role of VR Counselors

The majority (85%) of our respondents indicated that WIOA had shifted their roles as VR counselors working with transitioning youth. When we asked how it had impacted their role, most of the counselors across the states indicated that it increased the frequency of their contact and their collaboration with schools and school personnel, as well as students. For example, one counselor noted, “I estimate I spend more than twice as much time [in the schools] as I did pre-WIOA. Also, I have different relationships with schools. Before WIOA I spent time seeking referrals from schools. Now schools are more proactively sending referrals. Teachers are more on board than before.” In terms of increased time with students, another counselor noted, “I work with a lot of students who are not part of my official caseload (no case yet open) providing Pre-ETS. I also spend more time with individual students, as early as sophomore year but no later than junior year, to determine which of the Pre-ETS they will receive.” Another counselor noted, “It’s definitely changing my role and others (in schools and agencies). We now have multiple roles and multiple partnerships.” We did not note any significant state differences in this area.

Most counselors were positive about the shift created by WIOA in terms of increasing the frequency and intensity of contact with students and schools. For example, one counselor noted that outreach to schools by VR is “a good way to establish relationships and rapport with students before they are formal VR clients. They are then more likely to want VR services later.” However, a few of the counselors whose caseloads were not specialized transitioning youth caseloads noted that WIOA and Pre-ETS required additional time spent on students, which might negatively impact the time they could spend with adults on their caseload. As one counselor stated, “it seems that adults on my caseload will receive less attention and fewer services, although I really do not have any evidence of this yet.”

We also asked counselors about their role in the delivery of Pre-ETS. In this area, all but two of the 27 VR counselors were actively involved in the delivery of Pre-ETS. Another cross-state similarity was the most frequently cited Pre-ETS delivered: job exploration counseling and counseling for post-secondary opportunities. These Pre-ETS tended to be delivered directly by the VR counselor. Variation across states mostly occurred in the description of work-based learning experiences (WBLEs). Several of the states had existing school/community-based transition programs, and these were the basis for continuing to deliver WBLEs. Counselors in states where schools did not offer work-based learning experiences authorized community-based rehabilitation providers to deliver WBLEs (five of the respondents). Of note is that counselors in two of the states indicated that the highly rural nature of their geographic area hindered the development or implementation of community-based WBLEs, although one of these mentioned that reliance on Summer Youth Employment programs did help address transportation issues occurring during the school year.

## Theme 2: Perceived Challenges to VR Counselors Under WIOA

We asked our sample about some of the unique barriers they encountered as a result of WIOA. Some of the barriers cited were those, such as the frequently identified lack of transportation – that are challenges encountered in rural areas non-withstanding WIOA. However, some of the issues are unique to WIOA. For example, counselors in two of the states cited the effect of restricting the use of sub-minimum wages (Section 511) both on service availability in their communities and on their caseloads. One counselor stated that Section 511 had created challenges for families due to the “loss of vocational day programs” in the community, as well as the need for VR to advocate and offer more “community-based employment for students with significant disabilities” who might, in the past, have moved into sheltered workshops. While many of the respondents agreed that WIOA increased their collaboration with schools, teachers, and students, a couple noted the challenges in working with student families, either in terms of scheduling meetings, providing information about VR services to potentially eligible students, or getting families to follow through with VR application paperwork.

Another barrier noted across all of the states was increased caseload burdens, particularly regarding new documentation and “paperwork” resulting from expanding VR services to eligible and potentially eligible students, an issue cited by 11 of the respondents in the study. As one counselor said, “Paperwork associated with this activity (Pre-ETS) is also a barrier. There is a lot of it! I don’t feel that I can do the best service under these

circumstances.” Along with the requirements for additional documentation were caseload size issues noted by seven counselors, particularly those not serving a specialized youth caseload. Since WIOA requires counselors to serve both eligible and potentially eligible students, several of the counselors were anticipating significant increases in caseload size, and concerned about whether resources would be available to address it.

### Theme #3: VR Counselor Strategies and Practices to Address Barriers Under WIOA

We asked our sample to identify some of the strategies or practices they recommend for addressing the changes brought about by WIOA. Not surprisingly given some of the answers regarding barriers, more than half of the counselors identified time management as one of the useful strategies for incorporating Pre-ETS into their caseloads. For example, counselors shifted their hours to include evenings in order to meet the needs of students and families who were applying for services. Several counselors also indicated that a specialized caseload, and/or hiring specialized Pre-ETS counselors within their agency was another best practice associated with managing the changes resulting from WIOA.

Two of the states that had existing and long-standing transition programs or agreements between the school systems and VR appeared to have made the transition to Pre-ETS services with greater ease. In these two states, the existing transition program infrastructure was the foundation for structured roles for school and VR personnel, sharing resources for providing Pre-ETS services, and offering job placement for students exiting school. For example, one counselor highlighted the benefits of an existing program, noting, “I find it most useful to meet with students whenever they want to and we are now all housed in one place – at our Work Source Office.” This comprehensive office included VR counselors, workforce development programs, community college personnel, apprenticeship training and other career and technology training programs.

Counselors also addressed some of the outreach strategies they used to engage students in VR services. For example, one counselor noted that she relied on getting students into the community, “such as job shadowing in order to help them see the connection between school and work” available through Pre-ETS. A few respondents also noted reliance on community resources, such as community colleges. As one counselor said, “I go to 504 meetings and approach families and students about attending community college.” She went on to say that “working with students from age 15-16 will make me more approachable as they graduate and need more services,” and noted she makes sure students and teachers see her face often in the high school. Several respondents echoed this counselor, nothing that they spend “as much time as possible” in the schools, talking with special education teachers, providing training and presentations and even having “teacher interns shadow me on the job to learn what we do at VR.”

## Discussion

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The intent of the WIOA emphasis on students with disabilities was to address the long-standing barriers these youth encounter as they exit school and enter employment (NCD, 2017). In enacting WIOA, Congress recognized that students with disabilities “need more

opportunities to improve their workplace skills...and to get real world work experience” (NCD, p. 2). Another intent of the law was to foster closer partnerships between schools and state vocational rehabilitation agencies, so as to facilitate seamless transition from school to adult life. The results of our study demonstrate that VR counselors who work with this population are experiencing a significant shift in their activities under WIOA, and shifting their practices in order to accommodate them. For example, they are actively reaching out to schools, families and students in order to identify eligible students. They are spending more time in schools, and devising more collaborative approaches to ensuring that transition services are offered to eligible and potentially eligible students. VR counselors are working with families and local community providers both to educate them about Pre-ETS, and to help them re-tool their employment programs given the restriction on sub-minimum wages and the loss of vocational day services. It is also clear that VR counselors are delivering or authorizing all of the five Pre-ETS, with this sample most frequently citing job exploration counseling and counseling for post-secondary employment. Although VR counselors in states that had existing cooperative transition programs seem to make the shift more easily to Pre-ETS, other counselors were engaging community providers and schools in an effort to re-tool transition services to benefit students.

While all of these new practices suggest a positive outlook on the future of Pre-ETS, VR counselors in our study identified several of the challenges or barriers to implementation that are similar to those found in prior studies (e.g., NCD, 2017; Miller et al., 2018). One of the major over-arching issues emerging from all three studies involves the reporting requirements SVRAs must provide to RSA regarding Pre-ETS, meaning that counselors need to authorize, monitor and track additional services from their traditional RSA reporting requirements. The VR counselors in our study pointed to the additional paperwork and documentation burdens created by WIOA. Another significant barrier to Pre-ETS implementation that all three studies identified was the lack of adequate transportation services so that students could participate in, for example, community integrated work-based learning experiences. Counselors are not allowed to use Pre-ETS funds to purchase transportation services, a limitation in the WIOA regulations that was noted by the National Council on Disability’s 2017 report. Particularly in rural areas, restrictions on transportation funding restrict the opportunities for students with disabilities to adequately participate and benefit from community-based work experiences.

Given the important need for students with disabilities to have access to and benefit from vocational and career experiences during school, we can anticipate the expansion of Pre-ETS over the next few years (Miller et al., 2018). As such, it will be interesting to follow-up this initial study of a sample of SVRA vocational rehabilitation counselors’ experiences as they gain knowledge and experience in the implementation of WIOA. In addition, studies currently underway, such as the state-wide DIF programs funded in 2016 by the Rehabilitation Services Administration evaluating the impact of Pre-ETS work-based learning experiences on student post-school outcomes will inform the design and implementation of Pre-ETS based on evidence-based practices to improve the lives of students with disabilities.

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## About the Authors

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