



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

**Consortium for Citizens with Disabilities (CCD) Education Task Force
Comments on Technical Assistance to Improve Postsecondary Transition Services**

October 2, 2019

Thank you for offering the opportunity to provide input into technical assistance (TA) funded by the U.S. Department of Education related to improving postsecondary transition services.

The Consortium for Citizens with Disabilities (CCD) is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

We understand that the Department is particularly interested in exploring the provision of TA as it relates to future investments across four areas: 1) current challenges, 2) products (that should remain in use and new products needed to address critical needs), 3) strengthening TA, and 4) coordination and collaboration.

The following are comments collected by leaders of the Consortium for Citizens with Disabilities Education Task Force on the questions posed by the Department below.

What challenges are you currently experiencing in serving youth with disabilities between the ages of 14 and 24 who may or may not be in school?

There are three major areas where we face challenges in serving youth with disabilities: (1) in transition planning for all students with disabilities; (2) in coordination of transition services under vocational rehabilitation programs; and (3) in coordination of pre-employment transition services.

1. The Individuals with Disabilities Education Act (IDEA) requires transition planning for students with disabilities to begin before the student turns 16. The plan must be individualized, based on the student's strengths and interests, and map out goals and activities that will help the student accomplish their vision for life after high school. However, students are increasingly less involved in their own transition planning and goal setting. Frequently, transition plans are set without being individualized to each student and do not set ambitious goals or provide pathways for students to achieve them. Across the board, increased resources and professional development must be devoted to helping LEAs more meaningfully engage in transition planning with students with disabilities.

2. Transition services were added to the IDEA in 1990 and to Title I of the Rehabilitation Act (Rehab Act) in 1992. It is the responsibility of the vocational rehabilitation (VR) program to coordinate with the local schools in developing transition services as part of the IEP to provide transition services for students with disabilities. Unfortunately, we hear from our members in the field that all too often that this coordination is not happening at the state and local levels. Following is some of the feedback from our member organizations:

- Lack of individualization for transition services by school districts
 - Services are based on available programs rather than on students' abilities, needs, preferences, and interests.
 - Students with disabilities have difficulty getting into school district regular vocational programs.
- Lack of meaningful student engagement in setting ambitious post-secondary goals and developing effective transition plans that will lead to student success in college or career
- Lack of coordination between the LEA and the VR agency
 - VR agencies do not get involved until late in a student's schooling, postsecondary education, and career goals.
 - The VR agency is rarely at the table to help develop the IEP.
 - There is little collaboration about who is responsible for services that could be considered covered under either IDEA or the Rehab Act.
 - Assistive technology should be transferred with the student when they leave school or they should be assisted in receiving new technology for college and work.
- Lack of integrated employment experiences for students still in school, particularly after school or during the summer
- Teachers are not trained in employment services. There is little personnel preparation regarding the transition to postsecondary education and employment.
- VR counselors are not trained in understanding different disabilities. For example, they may not understand the different training and accommodations needed by job seekers with autism as compared to those with cerebral palsy.
- Shortage of trained VR counselors, especially in rural areas.

3. Since the passage of the Workforce Innovation and Opportunity Act (WIOA), State VR agencies must spend 15 percent of their budget on pre-employment transition services (Pre-ETS). Pre-ETS services include both providing services and participating with IEP Teams to assist in developing transition plans in IEPs for students. It may be too early to evaluate, but we believe will help with some of these problems. It is troubling to learn from a [recent GAO report](#), however, that fewer than half the 74 agencies reported that they used at least 15 percent of their VR grant allotment each year. (Students With Disabilities: Additional Information from Education Could Help States Provide Pre-Employment Transition Services, GAO, September 2018)

Technical assistance must be focused on improving the quality of and student engagement in transition planning as well as improving outcomes for students receiving transition services.

- 1. Do the five primary goals described above accurately represent your current challenges and TA needs and support your State's goals? If not, what do you suggest we remove, revise, or replace?**

We agree with the five primary goals. However, we propose that a sixth goal be added related to meaningful student engagement and participation in the transition planning and goal setting process. We believe student engagement in the transition process is critical to creating inclusive transition plans that build on a student's strengths, skills, abilities, and needs.

- 2. What kinds of TA tools, resources, or materials developed have been the most useful and relevant to your work?**

We are very pleased with the work of the WINTAC, NTAC and the RSA funded PTI programs and the work of RAISE in coordinating those programs. One member organization reported that the Pre-ETS Guidebook for community rehabilitation providers developed by WINTAC is very helpful.

- 3. What kinds of new TA tools, resources, or materials should a U.S. Department of Education-funded TA Center on transition develop in order to most efficiently and effectively support your State's work in this area?**

We propose using the results of OSEP monitoring to identify needs for TA to support transition work.

The National Council on Disability provided, among other recommendations, that RSA and OSEP develop joint nationwide training on how to coordinate on the provision of pre-employment services (p. 5 of the [report](#) on implementation of Pre-Ets)

Technical assistance materials specifically tailored to parents and people with intellectual and other disabilities would be valuable. Parents and people with disabilities need easy to read and step by step instructions. Existing tools from university centers and TA grantees should be shared with parents and people with disabilities.

Information on how ABLE accounts can help with transition services and postsecondary education should be included.

Since the mid-1990s the federal government has rightly been focused on assisting people with disabilities to transition into competitive integrated employment. We agree on this focus and believe increased technical assistance to states is needed to help students with disabilities be ready for work in the community. The TA Center could share models in states that have been successful in transitioning students with disabilities, including those with significant functional disabilities, to competitive integrated employment (CIE).

We are interested in understanding the long-term employment outcomes and experiences of individuals with both low and high incidence disabilities, and believe there is value in linking these employment statistics to their transition plans to measure the effectiveness of their transition plans and how helpful they are to individuals as they prepare for college and the workforce. We propose a study of a cohort of young adults with low incidence disabilities (visual impairment, hearing impairment, intellectual disability) and a cohort of young adults with high incidence disabilities—Specific Learning Disabilities, attention disorders (often under the Other Health Impairment category), Autism Spectrum Disorders, and more—for a period of time to track their educational progress, employment, and overall post-high school transitions as a way of understanding the value and quality of their transition plans and post-secondary success. We recommend building off of the foundational data collected by NLTS 2012 to provide explanatory information about student transition plans.

4. Are there any new or emerging TA needs or topic areas that a U.S Department of Education-funded TA Center on transition should consider? If not, are there any current TA areas that could be expanded upon or repositioned to better meet your needs?

The laws and policy guidance governing transition are clear and helpful. The biggest problem consistently reported by our members is that these laws are still not being implemented consistently. Students with disabilities need more assistance advocating for services to support their transition. We support any pilot program supporting legal advocacy for students.

We believe technical assistance must be strengthened around ensuring effective transition services are provided early, at least by age 14, as part of a free and appropriate public education (FAPE), especially for those with the most significant disabilities.

In addition, TA is needed in the area of communication needs of students with developmental disabilities who are transitioning to post-secondary education.

Students with disabilities are often excluded from Career and Technical Education (CTE) programs. On July 31, 2018, President Trump signed the reauthorization of the Carl D. Perkins Career and Technical Education Act. Consistent with CCD's priorities for updating the law are new provisions in the Act such as: including individuals with disabilities among the stakeholders that must be consulted in the development of the state plan; creating a new set-aside for the recruitment of individuals with disabilities to CTE programs that lead to high-wage in-demand careers; including provisions around public reporting on student subgroups and special population performance by program of study; and, expanding access and requirements for teacher professional development in Universal Design for Learning and other research-based teaching methods. We believe technical assistance must now be provided to help states implement the new requirements.

CCD is also pleased the Department recently (September 17, 2019) developed and published new guidance for [Increasing Postsecondary Opportunities for Students and Youth with Disabilities](#). This guidance clarifies important requirements related to the following.

- The opportunity for students with disabilities to enroll in postsecondary education programs while still in high school;
- The opportunity for students and youth with disabilities to enroll in a comprehensive transition and other postsecondary programs for individuals with disabilities after leaving high school;
- The coordination of transition-related services that students with disabilities may receive under the IDEA and under the VR program; and
- The financial aid available to students with disabilities enrolled in a comprehensive transition and postsecondary education programs for students with intellectual disabilities offered at Institutions of Higher Education (IHEs) under the Higher Education Act of 1965, as amended (HEA).

The new guidance clarifies that vocational rehabilitation funding may be used to support students in a variety of ways. It is important that federally-funded TA Centers provide technical assistance to VR state agencies, vocational rehabilitation counselors, as well as students and families about the use of these funds. However, the guidance falls short in explaining the use of IDEA funds for dually enrolled students and students enrolled in Comprehensive Transition Programs. Federally-funded TA centers must be able to provide clarification and technical assistance to states, districts, students and families on the use of IDEA funds.

- 5. Should a U.S. Department of Education-funded TA Center on transition continue to identify potential intensive TA sites through an application process or should this process be modified? If modified, what do you suggest?**

6. How can a center on transition best support States in their work of improving collaboration and coordination among SEAs, LEAs, SVRAs, CTE, Parent Information and Training Centers, and other relevant agencies and organizations?"

Greater focus is needed on supporting LEAs and educators to engage in meaningful transition planning with students. It is critical that students not be tracked into certain pathways based on their disability status or type of disability. TA Centers can help coordinate between SEAs, LEAs, parent support agencies and teacher preparation programs to provide increased supports and professional development to educators and properly support the student's IEP team to develop comprehensive, individualized, and ambitious goals for life after high school.

As suggested by state education agency officials interviewed for the September 2018 [GAO report](#), VR and educational agencies should coordinate funding to make services available where they are needed and to complement each other's transition efforts (p.24).

Over half (41 of 74) of state VR agencies reported in the GAO survey that additional assistance on coordinating with state education agencies would be useful for them. Similarly, officials from all three state educational agencies interviewed said they would like additional assistance on interagency collaboration.

RSA developed a very helpful checklist to analyze SEA and VR collaborative agreements. This could be used as a platform for more extended TA on these interagency agreements. It would also be helpful to develop model agreements.

Thank you again for the opportunity to provide input. If you have any questions, please contact any of the following co-chairs of the CCD Education Task Force:

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