

**Creating Change with Incremental Steps:
Enhancing Opportunities for Early Work Experience**

Authors:
Michael Morris
Nanette Goodman
Burton Blatt Institute at Syracuse University

January 28, 2013

This project was funded by the U.S. Department of Education, National Institute on Disability and Rehabilitation Research's Employment Policy and Measurement Rehabilitation Research and Training Center, under cooperative agreement H133B100030. The findings and conclusions are those of the authors and do not represent the policy of the Department of Education. The authors retain sole responsibility for any errors or omissions.

Introduction	4
Background.....	4
1. Empirical evidence.....	7
2. Review of programs and legislation that can facilitate work experience .	11
a. Transition Planning in the Individuals with Disabilities Education Act	13
i. Description.....	13
ii. Monitoring	13
iii. History.....	15
b. Vocational Rehabilitation.....	16
i. Description.....	16
ii. Monitoring	16
iii. History.....	17
c. Career and Technical Education.....	19
i. Description.....	19
ii. Monitoring	20
iii. History.....	20
d. Employment and Training Programs/Workforce Investment Act	21
iv. Monitoring	22
v. History	22
3. Availability and Use of Work Experience	23
4. Barriers to Effective Programs	26
a. Schools and IDEA transition planning	26
b. Vocational Rehabilitation.....	27
c. Career and Technical Education.....	29
d. Employment and Training Programs/Workforce Investment Act	29
e. Interaction with Social Security Programs	30
5. Recommendations	31
References.....	34

Creating Change with Incremental Steps

Enhancing Opportunities for Early Work Experiences

Introduction

In a post Americans with Disabilities Act (ADA) era, federal policies and government infrastructure have yet to be aligned to produce enhanced employment and economic status for millions of working age adults with disabilities. The fragmentation of service delivery systems and the complexity of well-intentioned work incentives for Social Security beneficiaries have been well-documented. Transformative ideas to reframe the relationship of government support, employers, service delivery systems, and youth and adults with significant disabilities require large scale demonstrations over an extended period of time to yield sufficient evidence to guide and inform policy reform.

In the interim, there are significant opportunities to create meaningful, sustainable change through more incremental steps that build on available evidence to shape policy development and improve guidance to the field on existing policy that can have meaningful impact on individual employment and economic results and systems alignment. This five-part series on “Creating Change with Incremental Steps” is not intended to displace larger policy frameworks for testing of big ideas. However, each of these defined change approaches will keep moving the public and private sectors forward to the benefit of the choices and interests of youth and adults with disabilities to be more productive, independent, and economically self-sufficient. This first paper offers the evidence for enhancing opportunities for early work experiences for youth with disabilities and the recommended policy changes and guidance to accelerate adoption of best practices.

Background

Youth with disabilities are much less likely to be employed as their non-disabled counterparts. In May 2012, the Bureau of Labor Statistics reported that their employment rate during the years following high school (ages 20-24) is 34 percent compared with 62 percent for youth without disabilities (US Department of Labor, 2012a) and this disparity continues through adulthood.

Getting youth with disabilities into the labor force early is a key determinant of the entire trajectory of their working lives. Research over the past 30 years has shown that youth with disabilities who have paid work experiences during their secondary school years are more likely to be successfully employed after they leave school than those without such work experience. This research has become the basis for several respected organizations

(National Association of Special Education Teachers, National Collaborative on Workforce and Disability for Youth) to include hands-on work as an essential element for preparing youth with disabilities for post-school employment.

Work experience while in secondary school increases youth's motivation to work toward a career, provides a greater understanding of the skills needed to succeed at job tasks and work with supervisors and coworkers, and gives the student a better knowledge of career options and a greater understanding of disability related work accommodation strategies (Burgstahler & Bellman, 2009). In addition, work experiences can raise the work-related aspirations of youth and their families, and demonstrate to employers and community members the value that adolescents with severe disabilities can make to the workforce (Carter et al., 2010).

In fact, the benefits of early work experience are not limited to adolescents with disabilities. Researchers across disciplines, including psychologists, sociologists, and economists, have found that the combination of work and schooling in adolescence can help develop independence, a sense of responsibility, and time-management and other skills useful for the transition to adulthood. However, studies of youth in general (regardless of disability status) have shown that work is not without risk. Teens who work long hours tend to have lower grades, are more likely to be absent from school and are more likely to drop out than teens who work fewer hours. In addition, as hours of work increase, adolescents drink and smoke more, and engage in a wide range of problem behaviors (Mortimer, 2010).

Working while in high school has become less common over the past ten years even for students without disabilities. Statistics from the Bureau of Labor Statistics (US Department of Labor, 2012b) indicate that the employment rate of teenagers ages 16-19 has dropped from 39.6 percent in 2002 to 25.8 percent in 2011. Summer jobs have also been on a downward trend. The percent of teens employed over the summer fell from 52 percent in the summer of 2000 to 33 percent in the summer of 2009. This trend is visible across all demographic groups by age, sex and race (Morisi, 2010). The decline is caused by several factors including three that are particularly relevant for discussing the employment prospects for students with disabilities: (1) Two recessions in the past ten years has meant that the types of jobs that teens would normally fill have become scarcer in part because of increased competition for such jobs from adults; (2) The number of federally funded summer jobs has diminished; (3) Increasing academic achievement required for graduation is limiting the time available for non-academic pursuits and increasing the number of students who are spending part of their summer in school (Morisi, 2010).

It is important to distinguish “work” from “work-related experiences”—a term used by schools and surveys that may include short-term career exploration opportunities such as workplace visits, short-term volunteering, or job shadowing in addition to hands-on work experience. Although research consistently finds positive impacts from hands-on work, research has found mixed results of whether these other opportunities increase post-

school employment rates (Hasazi, 1985; Shandra & Hogan, 2008; Carter et al., 2011a).

Some research places an emphasis on “quality jobs” while others focus on any job. The empirical research supporting the relationship between working while in secondary school and success in the adult labor market does not distinguish whether the high school jobs are consistent with the student’s long-term interests and career goals. “Even jobs that do not offer entry points into specific careers or align with their long-term interests can still provide an opportunity for the youth to learn basic skills and work habits applicable in future occupations, discover career-related preferences and interests, navigate interpersonal relationships more effectively, learn through encountering natural contingencies (both positive and negative), and develop greater self-determination.” (Carter et al., 2011b)

Many youth find part-time and summer jobs on their own, with help from friends or through family networks. Youth with disabilities face a number of barriers that make these avenues less productive and as a result these youth may need more assistance from government programs.

Several systems are in place to help high school students with disabilities achieve employment goals, including programs authorized by the Individuals with Disabilities Education Act, the Vocational Rehabilitation Act, the Perkins Vocational and Applied Technology Act and the Workforce Investment Act.

Unfortunately, these systems are only partially meeting the goal of serving all high school students who could benefit from assistance. Although the programs are encouraged to provide the needed support, none are mandated. Gaps in the system, overlapping responsibilities, and weak interagency agreements compound the problem. Some youth receive excellent services and support from small, targeted programs such as the Marriott Bridge program, Project Search and others. However, the system lacks a coherent vision on how best to help youth on a larger scale gain work experience during their high school years. The Individuals with Disabilities Education Act mandates that schools identify the skills, experiences and services that students need to transition from school to work. This could include high school work experience but that entails drawing upon other programs designed for that purpose, which may either not exist or not be easily accessed. Schools cannot serve this purpose by themselves as it is not their core competency and they generally do not have direct ties to employers. While career and technical education programs provide services, they do not focus on linking up with community jobs. At the same time, vocational rehabilitation programs kick in too late to assist students obtain jobs prior to graduation. The major federal program aimed at assisting at-risk youth—the Workforce Investment Act—accepts youth with disabilities, but there are no systematic mechanisms to promote their inclusion.

Revamping the system would take a major piece of legislation, but this paper points out some short-term steps that can be taken to increase the ability of these programs to facilitate work experience. We focus on two types of modifications including (1)

changes to enabling legislation and federal regulations and (2) changes to reporting and monitoring requirements. This paper is structured as follows:

Section 1 describes the empirical evidence that establishes that students with disabilities that gain work experience while in high school have more successful work outcomes as adults.

Section 2 reviews the federal laws and policies that are in place to facilitate work experience. This section includes a description of the laws and regulations with a focus on the specific components that address high school work experience, how the programs are monitored and a short history of the law.

Section 3 presents data on the extent to which students with disabilities work while in high school. The data shows that while students with disabilities overall are equally likely to work as students without disabilities, students with more significant disabilities are much less likely to work.

Section 4 describes potential reasons why current federal laws are not effective in facilitating work experiences for students with disabilities.

Section 5 presents recommendations for strengthening the effectiveness of federal legislation.

1. Empirical evidence

Studies conducted over the past 25 years provide empirical evidence that suggests that students with disabilities who have paid work experience while in school have higher rates of sustainable employment than students with disabilities who do not have work experience.

Determining the effectiveness of paid work experience, however, is a complicated task that must take into account the issue of self-selection. Students who obtained employment had the motivation to work, and probably had higher expectations, more encouraging parents, better social networks, fewer functional difficulties, and/or better work-related skills. A simple comparison of youths who had paid experiences while still in school with those who did not does not account for these differences, and thus may overestimate the impact of early work experience.

A multivariate analysis that attempts to capture some of these attributes may lessen this bias somewhat, but cannot eliminate it. While it is possible in a multivariate analysis to control for some of these characteristics such as severity of disability or availability of certain supports, other characteristics, such as motivation, are more difficult to quantify and capture. As a result, these studies show a strong correlation between secondary-school work experience and longer-term employment success but they do not show

causation. There will always be unobservable characteristics that will be associated both with the likelihood of obtaining employment while in school and the likelihood of obtaining employment later in life, independent of any impact of work experience prior to graduation.

A recent demonstration project conducted by the Social Security Administration may provide evidence for the causal link between employment during school and employment after graduation that addresses this methodological issue. The demonstration was a random assignment design. Youth who are SSA beneficiaries or at risk of becoming SSA beneficiaries were randomly assigned to receive either Youth Transition Demonstration (YTD) services or only non-YTD services generally available in the community. In other words, selection into the program was independent of characteristics that might be associated with employment.

YTD services included benefits counseling, job development, job placement, career counseling, and services to support employment. In addition, SSA waived certain SSI and SSDI program rules to provide incentives for youth with disabilities to initiate work or increase their work activity. Ten YTD projects were implemented across the country. Preliminary findings suggest that the projects that focused on employment and provided an intense level of service were able to significantly increase the probability that participants would be employed after high school (Fraker et al. 2013). This random-design demonstration assessed the impact of a combination of services and supports rather than a single service.

The studies most often cited as evidence of the benefits of work experience while in school and long-term employment are presented below in the order of their publication. They support the correlation between the two types of work, but as they do not have a randomized design, the studies thus cannot specifically attribute later work outcomes to earlier work experience.

1. Based on a sample of 459 youths from Vermont who exited high school between 1979 and 1983, Hasazi et al. (1985) found that students who had held paid part-time or summer jobs were more likely to be employed following high school than those who had not. Rather than employing a multivariate analysis, the researchers created subsets of the data based on gender, level of functioning and geographic location (urban/rural/metropolitan) and analyzed the bivariate relationship between high school job experience and post-school employment for each of the subsets. Of the students who held part-time jobs during high school, 70% were employed at the time of the interview compared with 41% of those not holding such jobs. Of the students who had no summer jobs, only 37% were employed compared with 46% for those who had subsidized summer jobs and 69% of those who had nonsubsidized jobs. Both these patterns were significantly replicated across the subsets of respondents. Students who participated in “work experience” programs most often associated with special class programs were no more likely to be employed than those students who had not participated in these

programs

2. Wagner et al. (1993) analyzed a sample of youth with disabilities from the National Longitudinal Transition Survey (NLTS) who were enrolled in school in 1987 and were out of school (graduated, dropped out or aged out) by 1990. The researchers developed a multivariate model to predict the likelihood of being competitively employed in 1990. The model included vocational education, working while in school, and a variety of other variables that could affect the outcome including: disability category, severity (self-care skills, functional mental skills), gender, household characteristics, race, attended a special school, was a vocational concentrator, took vocational survey courses, took college preparatory classes, percentage of class time in regular education, dropped out, frequency of seeing friends outside of school, belonged to a group in high school, percentage of student body in poverty, parent expectations

The study found that students who took vocational courses were significantly more likely to be competitively employed regardless of whether they took only a small number of survey vocational courses or whether they took a large number of related courses (a concentration). This finding is suspect given that almost all students in the study took some vocational courses (62% of students with disabilities took vocational survey courses and an additional 35% had a concentration in vocational and technical education) which means the students who did not take any courses were particularly unusual and may account for their lack of employment later on.

Although 39% of respondents had work experience while in high school, the study found that this experience did not increase the probability of longer term employment for youth with disabilities overall. However, it did have a significant impact for two disability groups. Working while in school increased the probability of employment for youth with physical disabilities by 33 percentage points and youth with mild disabilities by 10 percentage points.

3. Benz, Yovanoff & Doren (1997) analyzed a sample of 218 students with disabilities from Oregon and Nevada and 109 students without disabilities from Nevada to determine the effects of school-to-work programs. In a multinomial logit model, which included disability status, gender, social skills, vocational needs and job search skills, having at least two work experiences (e.g. community service, job shadowing, school based enterprise, youth apprenticeship or paid work experience) significantly increased the odds (odds ratio=2.03) of being competitively employed one year after high school. One problem with this study is that it only had children without disabilities from Nevada. The differences between the outcomes between children with and without disabilities in the study may be distorted by differences that exist in the two states' job markets and economies.

4. Benz, Lindstrom & Yovanoff (2000) analyzed the experiences of 709 participants in Oregon's Youth Transition Program (YTP) in the mid-1990s. Although youth participating in the YTP are representative of all secondary youth with disabilities with respect to primary disabling condition, students typically are referred to the program by school staff because of additional barriers to secondary completion and transition success. The researchers developed a multivariate model to predict whether students would be engaging in a productive activity (e.g. work or post-secondary education) at the time they exited the program. The independent variables included a number of personal and demographic characteristics, disability characteristics and needs and program services. The study found that holding two or more jobs while in the program significantly nearly doubled a student's likelihood of engaging in a productive activity.
5. Rabren, Dunn & Chambers (2002) examined the employment status of 1,393 former special education students who had exited from Alabama's schools between 1996-2000. The post-school survey was administered approximately a year after the students exited high school. Based on a logit model that included gender, race, disability type, graduation status, having a job at the time of school exit, or whether they were helped by VR, Mental Health, or another developmental disability agency, the study found that the odds of having a job one year after high school were 3.8 times greater for those who had paying jobs at the time they exited high school as compared to those who did not have a job at the end of school. The researchers did not report whether the survey instrument asked about jobs the student held earlier in high school and if these jobs affected the post-school employment status. Rather, it focused on whether the student had a job at the time they exited school.
6. Baer et al. (2003) surveyed 140 randomly selected former special education students who graduated (drop-outs were not included) from four Ohio school districts between 1997-2000. Three student-related and three program-related variables were used in the final logistic regression model to "produce the highest level of prediction with the fewest variables: (a) years out of high school, (b) having a learning disability, (c) being from a suburban school setting, (d) work study participation, (e) vocational education, and (f) regular academics." Work Study and vocational education both significantly increased the odds of post-secondary full-time employment (odds ratio 2.6 and 2.7 respectively). Because the researchers designed the model to maximize the predictive value with the fewest possible variables rather than to analyze the contribution of relevant variables holding constant any variables that might be correlated with both the relevant variable and the outcome variable, the findings have questionable validity. In addition, the survey included a question about working while were in high school. However, this variable was dropped from the final model ostensibly because it did not provide additional predictive value.
7. Shandra & Hogan (2008) analyzed the effects of student's participation in school-

to-work programs on employment outcomes (full-time work, annual income, employer-offered health insurance and receipt of paid sick days) using a sample of youth with disabilities from the National Longitudinal Survey of Youth (NLSY 1997). After controlling for a number of individual characteristics (sex, race poverty level, high school degree, post secondary education and severity of disability), they found that respondents who had participated in any school-to-work activities (job shadowing, mentoring, cooperative education, school sponsored enterprise, technical preparation, internships or apprenticeships, or enrollment in a career major) were 1.2 times more likely to be employed than those who did not participate. They found that among the different school-to work activities, cooperative education, which combines academic and vocational studies with a job in a related field, is the most consistently related to employment. Results indicate that participation in cooperative education is positively and significantly associated with annual income, full-time work, holding a job with employer-offered health insurance, and the receipt of paid sick days.

8. Carter, Austin and Trainor (2011a) used the NLTS-2 to analyze students with severe disabilities only. Respondents were considered to have a severe disability if they had an intellectual disability, multiple disabilities or autism and were eligible for an alternative assessment or the parent reported a functional cognitive skill deficit in at least two areas. They developed a multivariate model that included demographic factors, student skills, family expectations, prior work experience and others to predict the likelihood of the student being employed two years after high school. The study found that having paid work during school significantly increased the odds of the student being employed after high school (odds ratio of 2.41). Both paid school-sponsored work and paid community work were associated this early post-school employment. However, unpaid school-sponsored work was not associated with this outcome.

2. Review of programs and legislation that can facilitate work experience

Several federal programs and pieces of legislation direct states and school districts to provide employment-related services for students with disabilities. These include programs available only to people with disabilities, such as the federal-state funded vocational rehabilitation system, as well as programs available to students regardless of their disability status, such as vocational educational programs and programs operated through the Department of Labor's one-stop system.

In addition, most secondary school students with disabilities qualify for services under the Individuals with Disabilities Education Act (IDEA). The Act covers all school-aged children with certain qualifying conditions (i.e., autism, specific learning disabilities,

speech or language impairments, emotional disturbance, traumatic brain injury, visual impairment, hearing impairment, and other health impairments) and whose disability adversely affects their educational performance. The Act includes specific requirements for transition planning designed to identify and coordinate needed services from all available resources. As shown in Table 1, more than half of the transition age students covered under IDEA have learning disabilities.

Table 1: Number of Students Ages 16-21 Served under IDEA, by Disability Category

Disability category	
All disabilities	1,273,677
Specific learning disabilities	52%
Mental retardation	13%
Other health impairments	12%
Emotional disturbance	10%
Autism	5%
Multiple disabilities	3%
Speech or language impairments	3%
Hearing impairments	1%
Orthopedic impairments	1%
Traumatic brain injury	1%
Visual impairments	<1%
Deaf-blindness	<1%

Source: Author’s computation based on data from U.S. Department of Education, Office of Special Education Programs, Data Analysis System (DANS), OMB #1820-0043: "Children with Disabilities Receiving Special Education Under Part B of the Individuals with Disabilities Education Act," 2009. Data updated as of July 15, 2010. Percentages sum to slightly over 100% due to rounding.

Research often identifies “students with disabilities” as those who qualify for IDEA. This definition includes students who may not be considered “disabled” based on other definitions of disability such as those used in surveys or for SSA program eligibility.

In addition, some students with disabilities—those who may need accommodations but do not need specialized instruction or other special education services-- do not qualify for IDEA, such as students with chronic illness, epilepsy and ADHD. These students are entitled to a free and appropriate education under the broader definition of disability in the Section 504 of the Rehabilitation Act, which prohibits discrimination on the basis of disability. Schools are required to develop “504 plans” for these students, but unlike students covered under IDEA, students with 504 plans are not entitled to transition planning services.

The number of students covered under IDEA dwarfs the number of students with Section 504 plans. Almost 6 million elementary and high school students qualify for IDEA compared with 433,000 with 504 plans (Data Accountability Center, 2010; Shah, 2012). While it is important to recognize that not all students with disabilities are covered by IDEA, the vast majority of students with disabilities are covered, making IDEA a

valuable vehicle to affect change. Also, those not covered presumably are relatively better equipped to find employment on their own as their disabling condition is not seen to be as significant.

a. Transition Planning in the Individuals with Disabilities Education Act

i. Description

The Individuals with Disabilities Education Act (IDEA) mandates that each eligible child have an Individual Education Plan (IEP). During the annual IEP development process a team of stakeholders, which generally includes teachers, parents, school administrators, related services personnel, and students (when appropriate), work together to develop goals and identify the resources needed to achieve those goals.

The law requires that starting at age 16 (or younger if determined by the IEP team) the IEP must include transition goals that describe what each student would like to do when they exit high school and a plan to achieve these goals. The goals are supposed to be based on the student's strengths, preferences and interests (34 CFR 300.43(a)(2)). The transition plan is a "statement of needed transition services for the student including, if appropriate, a statement of the interagency responsibilities and any needed linkages." (34 CFR 300.347(b)(2)).

The IEP team can draw from any available resource in or outside the school system to meet the student's transition goals. This includes programs available to all students such as vocational education and Department of Labor programs, as well as programs targeted only to students with disabilities, such as vocational rehabilitation. The IEP must specify the role that each outside entity will play, but if the outside entity does not provide the service it is ultimately the responsibility of the school and the IEP team to ensure that the transition goal is met (20 USC 1414(d)(6)).

The current iteration of IDEA (2004) aligns with the No Child Left Behind Act (NCLB) in its emphasis on academic achievement and accountability measures. The Act specifies that transition planning be "results oriented" and focused on improving academic and functional achievement to facilitate the students transition to post-school activities including employment.

ii. Monitoring

IDEA requires states to monitor the local education authorities and submit a State Performance Plan (SPP) to the public and to the Department of Education (20 U.S.C. 1416(a)(3)(B); . 20 U.S.C. § 1416(b)(1)(A) (2006); 34 C.F.R. § 300.601(a) (2012)).

The Department of Education requires that all states report on 20 indicators including two that are particularly relevant for measuring the strength of transition planning:

- Indicator 13: “Percent of youth with IEPs aged 16 and above with an IEP that includes appropriate measurable postsecondary goals that are annually updated and based upon an age appropriate transition assessment, transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals, and annual IEP goals related to the student’s transition services needs. There also must be evidence that the student was invited to the IEP Team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP Team meeting with the prior consent of the parent or student who has reached the age of majority” (US Department of Education,2012).
- Indicator 14: “Percent of youth who had individualized education programs (IEPs), are no longer in secondary school and who have been competitively employed, enrolled in some type of postsecondary school, or both, within one year of leaving high school” (US Department of Education, 2012).

In order to measure performance on Indicator 13, states have an option of creating a checklist or using one created by the National Secondary Transition Technical Assistance Center (NSTTAC). In 2009-2010, three-quarters of the states used the NSTTAC checklist, which includes nine questions about content and process of developing the IEP. Among other things, the checklist specifies that in order for a transition plan to meet the indicator 13 standard, the plan must include postsecondary goals in training and/or education and employment. And, for each postsecondary goal, the plan must identify a transition service such as instruction, related service or community experience that will enable the student to meet the postsecondary goal (NSTTAC, 2009).

Thus, while the indicator itself refers “transition services, including courses of study, that will reasonably enable the student to meet those postsecondary goals,” the checklist does not include specific reference to “community experience.” In addition, the indicator is very broad and includes a wide range of activities. As a result it cannot be used to measure progress on just one of those activities. In 2009-2010, state scores on Indicator 13 varied between 3 percent and 100 percent with a mean of 80 percent calling into question the validity and reliability of the reporting metric.

Indicator 14 attempts to capture the outcome of transition planning by surveying youth after they leave school. Despite initial methodological challenges in collecting the data, most states were able to report the measure for the 2010-2011 school year. On average, 32 percent of students were enrolled in higher education, 60 percent were either enrolled in higher education or competitively employed and 77 percent were enrolled in higher education, or in some other postsecondary education or training program, or competitively employed. (Calculated from data available at US Department of Education, 2012). Because post school outcomes result from a variety of different factors, indicator 14 does not measure the availability of high school work experience.

iii. History

IDEA's transition provisions have evolved since its inception, which marked the beginning of the requirement that people with disabilities between the ages of 3 and 21 be offered a free appropriate public education in the least restrictive environment. Legislation which modified the original IDEA includes:

Education of All Handicapped Children Act of 1975 (P.L. 94-142) established that in order to receive federal funds, states must ensure that all students with disabilities have the right to receive a free and appropriate public education in the least restrictive environment. Legislation required testing and evaluation procedures, the development of an Individual Education Plan (IEP), parent rights and due process

Education of the Handicapped Act Amendments of 1983 (P.L. 98-199) added an emphasis on transition services. The legislation authorized federal funds to develop and disseminate programs and best practices that included vocation, transition and job placement services.

The *Individuals with Disabilities Education Act of 1990 (P.L. 100-476)* added transition services and assistive technology services as new definitions of special education services that must be included in the IEP. The legislation mandated that transitional services include a coordinated set of activities with an outcome-oriented process and that all students aged 16 years and older were to have a written individual transition plan (ITP) as a component of their IEP. The ITP was to include a statement of interagency linkages and their role and responsibilities in assisting the transition process. It established that the IEP team would have a follow-up meeting if the interagency service provider failed to provide any agreed-upon services in a student's IEP/ITP.

The *Individuals with Education Act Amendments of 1997 (P.L. 105-17)* established that beginning when the student is 14, the IEP must include a statement of the student's transition service needs "that focuses on the child's courses of study (such as participation in advance-placement courses or a vocational education program." Beginning at age 16 (or younger if determined appropriate by the IEP team), the IEP is to include a statement of needed transition services, including, when appropriate, a statement of the interagency responsibilities or any needed linkages (34 CFR 300.43(a)(2)).

In the current law, the *Individuals with Disabilities Education Improvement Act of 2004 (P.L. 108-446)*, the definition of transition services was amended to emphasize a focus on improving the academic and functional achievement of the student. In addition, in response to complaints from both parents and local educational agencies that the 1997 law creates confusion as to what schools are obligated to provide to students at various times, IDEA 2004 replaced the age 14/16 distinction with a uniform standard of age 16 that is "readily understandable by teachers and students" (S. Rep. No. 108-185, 2003).

b. Vocational Rehabilitation

i. Description

Title I of the *Rehabilitation Act of 1973 (P.L. 93-112)* (Rehabilitation Act), most recently reauthorized under the *Workforce Investment Act of 1998 (P.L. 105-220)* (WIA), provides for individual states to receive federal grants to operate a comprehensive VR program designed to assess, plan, develop, and provide VR services to eligible individuals with disabilities to prepare for, and engage in, gainful employment.

The Act defines “transition services” as “a coordinated set of activities for a student, designed within an outcome-oriented process, that promotes movement from school to post school activities, including postsecondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation (29 U.S.C. § 701 Sec 6 (37)).

Neither the Act nor the administrative rules specify a minimum age at which students may become eligible for services nor do they include specific reference to services for facilitating work experience while in secondary school.

Section 101(a)(11)(D) of the Rehabilitation Act requires the state VR agency to coordinate with educational officials and to enter into a formal interagency agreement with the state education agency. The agreement must outline the roles of the each agency in providing transition services and identify who will be responsible for providing what services.

The Act also requires VR be the payer of last resort for many services. VR is not supposed to pay for a service if a similar, or comparable, benefit is available through another provider (29 U.S.C. §721(a)(8)).

The Rehabilitation Act requires that if a state agency cannot provide vocational rehabilitation services to all eligible individuals who apply for services, the agency must develop an “order of selection” and serve individuals with the most significant disabilities first for the provision of vocational rehabilitation services. Those eligible individuals who do not meet the order of selection criteria will have access to services provided through the agency’s information and referral system.

ii. Monitoring

Under the Rehabilitation Act, states are required to submit to the Commissioner of the Rehabilitation Services Administration (RSA) annual reports on state performance.

Although each state is required to report the number of transition age youth (defined as ages 14-24), they are not required to report the number of youth that are more closely aligned with high school age (e.g. 14-18) or the number of students served while in high

school. As a result, it is difficult to identify how significant a role VR plays for this population.

In addition to the annual state reports, The Rehabilitation Act requires the Commissioner of the Rehabilitation Services Administration (RSA) to conduct annual reviews and periodic on-site monitoring of programs (29 USC Sec. 727 (a)(1)(A)). RSA typically reviews 15-20 agencies per year (Department of Education, 2012)).

RSA revised its monitoring and technical assistance process in 2011 to include a special focus on transition services and employment outcomes for transition age youth.

According to the Monitoring and Technical Assistance Guide (MTAG), “teams will identify and assess the variety of transition services provided in the states, including community-based work experiences and *other in-school activities*, and post-secondary education and training, as well as the strategies used to provide these services” (US Department of Education, Office of Special Education and Rehabilitation Services, 2010, page 22. *Italics added for emphasis*).

Despite the mention of in-school activities, the MTAG does not require the review teams to assess the availability of job search and job placement services for in-school youth. Several questions about the role of VR in facilitating paid work experience are included in an appendix to the MTAG. For example: A series of questions designed for school personnel asks if the school has entered into interagency agreements with the VR agency on a local level, the type of services that VR provides under the agreement and who bears the cost. The appendix suggests that student VR clients be asked to identify the types of services they receive based on a checklist that includes paid work experience. However, these questions are optional and, as a result, not all monitoring reports address the issue.

VR agencies are not specifically required to facilitate paid work experiences for high school students so even if the monitoring process captured the relevant information, RSA does not have a mechanism to require that they include the service.

iii. History

The current VR system grew out of a program in which the federal government provided matching funds to states to help wounded veterans reestablish themselves after World War I. In 1920, Congress expanded the veteran's program to include anyone with a physical disability. The Social Security Act of 1935 made vocational rehabilitation a permanent federal program.

The Vocational Rehabilitation Amendments of 1943 (Barden-LaFollette Act) broadened the program's financial provisions, offered a comprehensive definition of vocational rehabilitation, expanded services to include physical restoration, and required each state to submit a written plan for approval by the federal agency as to how federal/state dollars

would be used; expansion of services included on a limited basis person who were mentally handicapped and mentally ill; and, fostered separate agencies for general rehabilitation and rehabilitation of persons who were blind.

The 1965 amendments modified the term disability to include people with “behavior disorders.” This included people with drug and alcohol abuse issues and public offenders. The number of beneficiaries exploded, the change quickly overwhelmed the system, and VR officials had to streamline the process. The process became less individualized and people with the most significant disabilities were not served well (Minnesota Governor’s Council on Developmental Disabilities, 2006).

In 1973, Congress redirected the Act with passage of the *Rehabilitation Act of 1974 (PL 98-221)* The Act authorized a formula grant program of vocational rehabilitation that focused on people with significant disabilities. The Act defined disability as a “mental or physical disability which for such individual constitutes or results in a substantial handicap to employment” and “can be expected to benefit in terms of employability for vocational rehabilitation services.” In addition, it requires the state establish an “order of selection” so that if it cannot provide services to all eligible individuals, it will serve those with the most significant disabilities first. (P.L. 98-221 7(A)).

In order to reinsert flexibility and individualization into the process, counselors and consumers would now work in close partnership to individualize services and each counselor-consumer team would use a formal Individualized Written Rehabilitation Program to help them develop and deliver services.

In addition to defining the role of the vocational rehabilitation system, the 1973 Act established equal access as a “right” and addressed the removal of architectural, employment and transportation barriers. Title V prohibits discrimination on the basis of disability in programs conducted by Federal agencies, in programs receiving Federal financial assistance, in Federal employment, and in the employment practices of Federal contractors.

The Rehabilitation Act was amended six times between 1974 and 1993. These amendments strengthened the emphasis on people with the most significant disabilities (P.L. 95-602 (1978)); authorized rehabilitation agencies to provide supported employment (e.g. job coaches) (P.L. 99-506 (1986)); and emphasized the importance of empowering people with disabilities by involving them more fully in the construction and annual review of their individual rehabilitation plans (P.L. 102-569 (1992)).

The Rehabilitation Act was incorporated into *The Workforce Investment Act and Rehabilitation Act Amendments of 1998 (P.L. 105-220)*. The Act was to provide a "one-stop delivery system" for individuals needing help in securing employment and to facilitate the sharing of employment resources (such as job leads) by involved agencies. The Act set out that individuals with disabilities would be served by a variety of programs and would not be strictly dependent upon vocational rehabilitation. The Act

was to have been reauthorized in 2003, but a variety of political and substantive policy impediments have blocked progress. As of January 2013, the Act has not been reauthorized.

c. Career and Technical Education

Several federal laws including the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, IDEA, the Perkins Act, and the Work Incentives Improvement Act guarantee students with disabilities equal access to programs and services available to students without disabilities.

i. Description

Career and technical education in secondary school has been transformed in the last 20 years. Until 1990, the vocational education system was focused on developing specific job skills and was isolated from the academic curriculum. It was often thought of as a “dumping ground” for academically inferior students.

Schools have been moving to a newer model that integrates academic and career-based skills. The new model includes formats such as tech prep, career academies, school registered apprenticeships, student internships, career-oriented high schools, and school-based enterprises.

One advantage of this approach is that it provides children whose focus is primarily vocational with a better general education that could allow for more flexibility later in their careers. It also allows children whose primary focus is not vocational education to obtain some career and technical skills. A disadvantage, though, is that it decreases the concentration on developing particular skill sets needed for technical work.

In addition to training in schools, career and technical education (CTE) programs offered by local school districts and employment support services offered through the Department of Labor’s One-Stop Career Centers can potentially facilitate work experience for high school students.

Although the nature of CTE varies by state and by school district, most secondary schools offer at least one occupational program and many districts provide access to a wide range of programs through CTE high schools. The programs use a combination of school-based coursework and work-based learning. Examples of work-based learning include cooperative education, internships and apprenticeships, school-based enterprises, job shadowing and mentoring.

More than 95 percent of high school students take at least one CTE course during their high school career and about one third of high school students take a concentration of three or more related CTE courses before they graduate. However, CTE programs serve a somewhat disproportionate share of students with disabilities. In 1998 students with

disabilities represented 2.8 percent of all high school graduates but 4.2 percent of all occupational concentrators. The most commonly offered career clusters are: business; computer technology, mechanics and repair, precision production, construction, child care and health care (Levesque et al., 2008).

ii. Monitoring

States are required to submit a “Consolidated Annual Report” to the Department of Education that includes data on six student performance measures at the secondary level: (1) academic attainment in reading/language arts and math (2) technical skill attainment (3) secondary school completion (4) graduation rate (5) student placement and (6) non-traditional participation and completion. In addition to statewide totals, states must provide data for each of eight special populations including students with disabilities.

States compare this annual data to specific performance targets that they negotiate with the Department of Education. The Act stipulates the steps a state must make if it does not meet at least 90 percent of its targets.

None of the performance measures require the state to report on the number of students who participate in different types of programs such as school-based coursework and work-based learning nor does it require state to report on the type of work-based learning (e.g. hands-on job experience).

iii. History

Vocational education has evolved since the federal government established its role in in the field in 1917 with the *Smith-Hughes Act (P.L. 65-347)*. The Act established vocational education as separate from the academic curriculum and focused on providing narrow technical and production skills. The Act specified specific trades that should be taught and required that vocational education students spend at least half their time learning practical work skills. This act was updated and re-authorized many times, but the first major change in the approach to vocational education occurred in 1963.

The *Vocational Education Act of 1963 (P.L. 88-210)* shifted the focus from providing specific types of vocational programs to developing programs that served specific types of students. The law stipulated that funds be used for persons who have a disability, are disadvantaged, or have limited English proficiency. It specified that disabled students should have access to regular vocational education programs. A 1968 amendment (P.L. 90-576) confirmed this commitment by requiring each state to earmark 10% of its basic grant for services for youth with disabilities (Silverstein, 2000).

Carl D. Perkins Vocational Education Act of 1984 (P.L. 98-524) had two interrelated goals. First, the law sought to improve the skills of the labor force and to prepare adults for job opportunities. Second, it sought to improve the access to vocational education to

students who have been underserved in the past or those who have greater-than-average educational needs. Under the act, "special populations" include those who have a disability, are disadvantaged, or have limited English proficiency (Harvey, 2001).

The *Carl C. Perkins Vocational and Applied Technology Education Act of 1990 (P.L. 101-392)* represents a major shift in the way vocational education had been provided. While earlier legislation separated and isolated vocational teachers, student and curriculum from the rest of the school community, the Perkins Act of 1990 sought to integrate academic and vocational education.

Subsequent reauthorizations and amendments eliminated the set-aside funding for special populations but, in an effort to ensure equal access for special populations, the law required each state to report progress on core indicators for program participants overall and for each of the special populations.

Most recently, Congress reauthorized the *Carl C. Perkins Vocational and Applied Technology Education Act of 2006 (P.L. 109-270)* despite pressure from the Bush administration to shift the funds to academic education. The legislation changes the term “vocational education” to “career and technical education.”

The Perkins Act was complemented by the *School to Work Opportunities Act of 1994 (PL 103-239)*, which allocated funds to establish statewide partnerships to increase: (1) school-based initiatives such as career links to academic curriculum and career-awareness activities; (2) connecting activities, such as the development of partnerships with employers and post-secondary institutions and (3) work-based activities such as job shadowing, internships, and apprenticeships. It was established to bridge the gap between education and work for all students, not just those participating in CTE. After its initial five years, the STWOA was not reauthorized.

d. Employment and Training Programs/Workforce Investment Act

In addition to the employment support services available through career and technical education programs in public schools, at risk youth, including youth with disabilities, may access the Department of Labor’s employment and training programs established in the *Workforce Investment Act of 1998 (P.L. 105-220)*.

WIA integrates multiple employment and training programs into a One-Stop delivery system. Each local One-Stop system (recently renamed America’s Job Centers) is comprised of numerous partners that provide services based on their authorizing legislation. While the Act establishes certain minimum requirements for the structure of the local system, it allows local communities significant flexibility in the design and implementation of their One-Stop systems.

In addition, WIA requires states to establish Youth Councils and, under the direction of

these Councils, offer ten services to youth ages 14-21. (1) Tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies; (2) Alternative secondary school offerings; (3) Summer employment opportunities directly linked to academic and occupational learning; (4) Paid and unpaid work experiences, including internships and job shadowing, (5) Occupational skill training; (6) Leadership development opportunities, which include community service and peer-centered activities encouraging responsibility and other positive social behaviors; (7) Supportive services; (8) Adult mentoring; (9) Follow-up services; and, (10) Comprehensive guidance and counseling (20 CFR 664.410).

WIA is targeted to low-income youth, however the legislation includes provisions to ensure that youth with disabilities with higher family incomes have an opportunity to participate. For example, when determining income criteria for eligibility, for youth with disabilities WIA considers only the personal income of the teenager, not the income of his/her family. As a result, most youth with disabilities qualify for services (National Center on Workforce and Disability/Adult, 2007).

iv. Monitoring

WIA has two sets of performance measures for transition age youth. For older youth (aged 19-21), states must report entry and retention in employment, earnings received, and attainment of a recognized credential.

For younger youth (age 14-18), states must report the following (U.S. Department of Labor, 2009):

- Attainment of basic skills and, as appropriate, work readiness or occupational skills;
- Attainment of secondary school diplomas and their recognized equivalents; and
- Placement and retention in postsecondary education, advanced training, military service, employment, or qualified apprenticeships.

In addition to statewide totals, the state must provide the data for special populations including people with disabilities, public assistance recipients and out-of-school youth.

Each state negotiates an expected level of performance for a variety of indicators. Technical assistance, sanctions, and Federal incentive funds are tied to whether States meet the expected levels of performance.

v. History

WIA represents an evolution in the federal government's approach to job training. Previous legislation included the *Manpower Development Training Act of 1962 (P.L. 87-415)* that launched the era of federal funding for employee training and development. It

authorized funds for a three-year program for training and retraining unemployed and underemployed adults. It was replaced by the *Comprehensive Employment Training Act of 1973* (PL 93-203). CETA provided block grants to state and local governments to support public and private job training and included youth programs such as the Job Corps and Summer Youth Employment.

The *Job Training Partnership Act of 1982 (JTPA)* (P.L. 97-300) replaced CETA and established programs to prepare youth and unskilled adults for entry into the labor force and to afford job training to economically disadvantaged individuals. The statute enlarged the role of state governments and private industries in job training programs, imposed performance standards, created program for retraining displaced workers.

Both CETA and JTPA specifically allocated funds for summer jobs programs. WIA modified this approach by requiring each local workforce area to have a year-round youth services strategy that incorporates summer youth employment opportunities as just one of ten required program elements. As a result, the number of summer jobs programs dropped when WIA came into effect (Social Policy Research Associates, 2004). The paucity of summer jobs programs continued until 2009 when the *American Recovery and Reinvestment Act* provided additional funding for summer jobs programs for disadvantaged youth.

3. Availability and Use of Work Experience

No data exist that document that percentage of students with disabilities who have work experience over the course of high school and compares that figure to students without disabilities. However, the 2003 wave of the Department of Education's NLTS-2 provides three measures of employment of students 15-19: employed at the time of interview; employed at some time in past year; and employed at some time in the past two years.

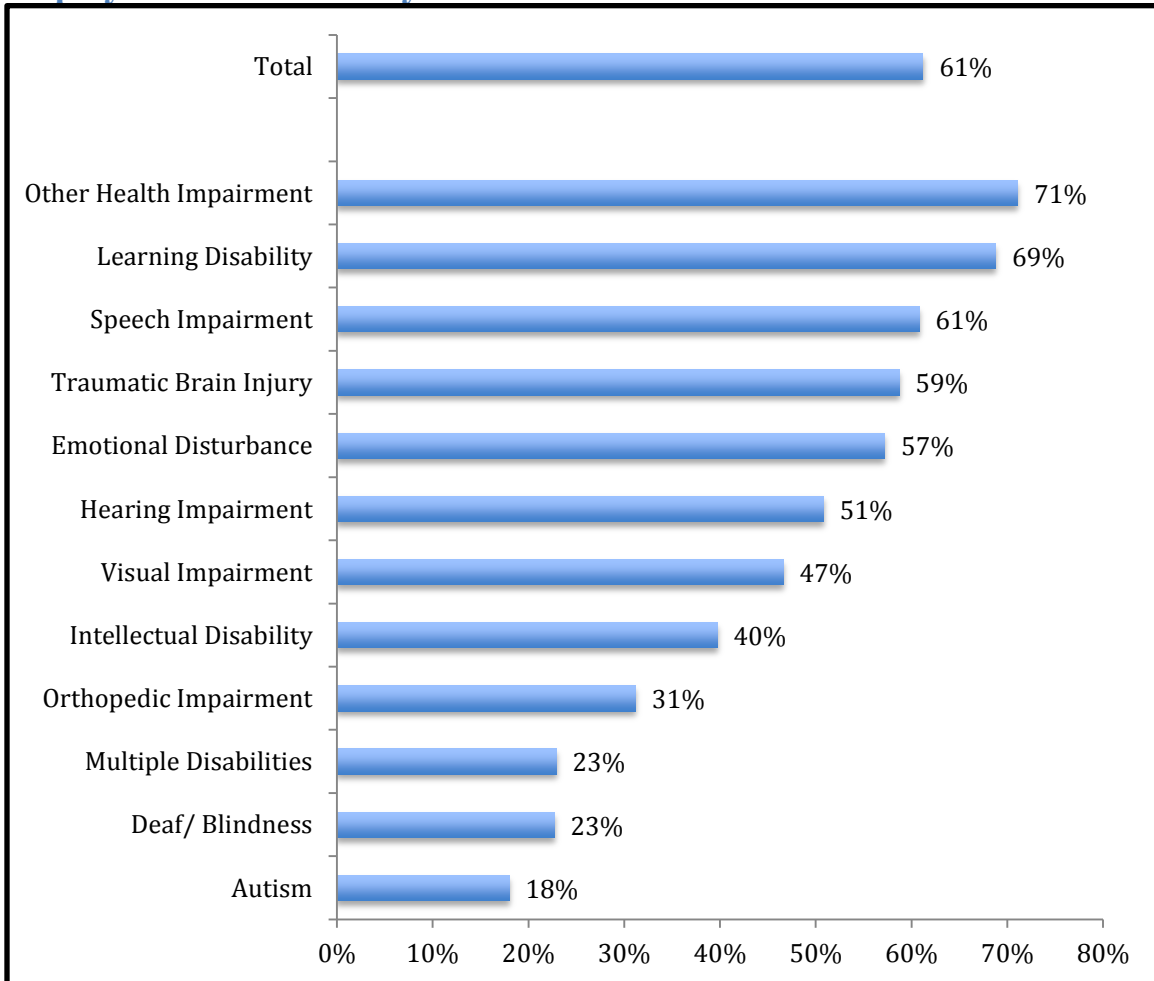
Thirty percent of students with disabilities were employed at the time of the NLTS interview in 2003. This percentage is less than that measured by the BLS's Current Population Survey. That data suggests that 36.4 percent of all teens 16-19 were employed at any point in time in 2004 (Bureau of Labor Statistics, 2005).

Unfortunately, it is not possible to make the same comparison based on the other NLTS-2 data elements because BLS does not provide statistics on the percentage of teens employed at any time over the past year or over the past two years. Nevertheless, the other NLTS-2 data yield important findings.

According to the NLTS-2, 61 percent of youth 15-19 had been employed in the past two years - some at work-study jobs, some at summer jobs and others at non-school-related jobs during the school year. This rate varies significantly among disability type. As shown in Figure 1, 69 percent of students with learning disabilities had been employed but only 40 percent of those with intellectual disabilities and 18 percent of those with

autism.

Figure 1: Percent of high school youth age 15-19 with disabilities employed in the last two years



Source: National Longitudinal Transition Study 2. (2003). NLTS2 data tables. Available at: <http://www.nlts2.org>

The summer months represent a natural avenue for youth to gain community-based work experiences. Holding a summer job represents a normative experience for youth without disabilities. Descriptive studies, however, suggest that many adolescents with disabilities remain uninvolved in work and community activities during the summer months (Carter, et al., 2010).

According to the NLTS-2, 53 percent of youth 15-19 had summer jobs in 2003 (41% had jobs both during the summer and school year, 13% had jobs during the summer only). This is roughly equivalent to BLS data that suggest that more than half of all 16-19 year olds work during the summer of 2005 (Bureau of Labor Statistics, 2006).

However, like employment overall, summer employment varies dramatically among disability types. For example, only 40% of teens with visual impairments, 32 percent with intellectual disabilities, 26 percent with orthopedic impairments and 15 percent with autism, worked during the summer (NLTS-2, 2003).

Despite the existence of programs to help youth get jobs during high school, evidence suggests that few students use these services. For example, Carter et al. (2011b) found that youth primarily found their jobs either on their own or with help from their parents, other relatives, or friends. Reliance on teachers or school staff varied among disability types. Only six percent of students with learning disabilities received help from school staff in contrast to 12 percent of students with emotional behavioral disabilities and 36 percent of students with intellectual or developmental disabilities. No one reported receiving help finding a job from vocational rehabilitation (Carter et al 2011b). The NLTS-2 does not provide data on the job search experience of high school students but it shows that among students with disabilities just out of high school seven percent received help from an employment agency and five percent received help from school staff (Newman et al., 2009).

Table 2: Source of Job Search Assistance among Youth

	Summer Jobs while in high school ¹			Post-high school jobs ²
	Emotional /Behavioral Disability	Intellectual/ Development Disability	Learning Disability	Youth with any disability 1-4 years after high school
Youth reported finding job himself or herself	30%	14%	25%	50%
Youth had help from:				
Family member (parent or other relative)	42%	53%	55%	19%
Friend or acquaintance to youth	27%	18%	24%	20%
Employment agency*				7%
Teacher/school	12%	36%	6%	5%
Other*	9%		6%	

Sources: ¹Carter et al. 2011, ²Newman et al. 2009.

* “Employment agency” was not an option in Carter et al. 2011b and “Other” was not an option in Newman et al. 2009

Carter et al. (2010) found that schools offer an array of career development opportunities but participation by youth with disabilities in these experiences varies and is generally fairly limited. For example, 91 percent of schools offer career interest assessments and in 75 percent of those schools either some or most of students with severe disabilities used the services. Almost all schools reported that some or most of the students with

emotional or behavioral disabilities (EBD) used the services. In contrast, only 44 percent of schools offered job placement services for students and half of students with either severe disabilities or EBD used the services. (Table 3)

Table 3: Availability and Accessibility of Career Development Activities for Youth with Disabilities

Activities	% of Schools offering the service	% of schools offering the service that report some or most of youth with disabilities use the service	
		Youth with severe disabilities	Youth with emotional and behavioral disorders
Career interest assessments	91	76	97
Job-shadowing Programs	82	36	43
Apprenticeship programs	71	9	13
Paid or unpaid internships	68	35	19
Cooperative education programs	53	20	33
Job placement services for students	44	53	46

Source: Selected data from Carter et al. 2010.

4. Barriers to Effective Programs

Youth with disabilities face a number of obstacles to working while in high school, including parental and teacher expectations (Carter et al., 2011a), a mismatch between work place skills and expectations (Trainor et al. 2010), limited awareness and understanding on the part of employers (Joshi et. al, 2012) and others.

IDEA transition planning, Vocational Rehabilitation, Career and Technical Education and Local One-Stop agencies are expected to help them overcome these obstacles. However, the programs themselves have barriers that prevent them from working effectively to promote high school work experience. This section describes the weaknesses in each of the programs.

a. Schools and IDEA transition planning

The characteristics of the transition planning process vary by state, by school and by characteristics of the youth and their family. Studies have indicated a number of barriers as to why community work experience is often not included in transition planning:

1. Schools and special educators find it challenging to locate appropriate opportunities. They perceive a paucity of employers willing to hire youth with disabilities and they have limited training, time, resources and available avenues to effectively conduct job development and build relationships with employers

(Carter et. al 2011b).

2. The increased focus on core academic areas, standards-based curricula and high-stakes testing has shifted focus away from exploring student's nonacademic goals (National Council on Disability, 2008).
3. Students and families may have low expectations about the ability of the student to work or may be unaware of the available opportunities. The IDEA process is an opportunity to educate students and families about choice and expectations, however students and families are often not adequately engaged in the IEP transition planning process (Lowe, Morris & Kennedy, 2012)
4. The Department of Education requires that all states report on 20 indicators to chart the progress of IDEA. Although two indicators are relevant for measuring the strength of transition planning, neither effectively measures the availability and use of community work experience.

b. Vocational Rehabilitation

Some state VR programs have developed comprehensive services and strong collaborative relationships with special education programs at the state and local levels to address the needs of transitioning students. However, anecdotal evidence suggests that there is tremendous variation in both transition practices and the resources committed to such practices among state VR agencies (Study Group, 2007). In addition to this variation, the following stumbling blocks are common across VR agencies.

1. The Rehab Act describes transition services but makes no specific mention of job search assistance or job supports while the student is still receiving services from the school. As a result, many VR agencies see this role as outside their core responsibilities.
2. Because VR is supposed to be the payer of last resort, they are limited in the extent they can participate in providing services to children who are still in school, which puts the responsibility in the school's domain, even though it lies outside their core competence. Moreover, financial incentives work against collaboration, which limits cost-sharing. As a result, VR counselors generally limit their involvement to development of transition IEPs and IPEs and providing career counseling and guidance until the student leaves school.
3. The state and local interagency agreements are vital for the coordination between VR and the education authority, however they have significant limitations:
4. The agreements often overestimate the capacity of the VR agency to fully implement all of the procedures, processes, and services identified within these

agreements.

5. The agreements are often not specific enough concerning the roles and responsibilities of each agency.
6. Mechanisms are not in place to determine whether procedures, processes, and services specified in interagency agreements are carried out, or whether they have the intended impact (The Study Group, 2007).
7. Key stakeholder groups have differing expectations about the services and level of involvement that VR can currently provide to transition-age youth. Education personnel want more communication with VR counselors, a consistent referral process, and more work-based learning opportunities provided through VR for their students (National Council on Disability 2008).
8. Local education agencies do not effectively engage VR agency personnel in the planning and provision of transition services for transition-age youth (Study Group, 2007). If VR is involved at all, it is late in the process. For example, Cameto et al (2004) found that a VR representative was at 10 percent of IEP meetings of 16 year olds and 25 percent of meetings for 17-18 year olds. Youth with disabilities and their families are not always aware that their children may be eligible for VR services during their high school years. For many students, it is not until their final year in high school that the school requests approval from the family for a referral to the local VR agency.
9. The order of selection requirements may make it unlikely that some groups of transition-age youth (e.g., individuals with milder learning disabilities, Asperger's Syndrome, Attention Deficit Hyperactivity Disorder) will actually receive services, despite that fact that they have been determined eligible for and could benefit from the array of VR services (National Council on Disability, 2008).
10. States that have dedicated VR counselors who serve the transition population as all or a set percentage of their caseload put a higher priority on transition populations. However, only a few states have VR counselors assigned to local school districts. For the other states, VR services are only provided to transition-age youth upon request of the parent or when initiated by the school (The Study Group, 2007).
11. The number of transition-age youth served by VR has increased steadily over recent years and VR transition coordinators are finding it difficult to meet the demand for involvement in the transition IEP (National Council on Disability, 2008).
12. The current methods for monitoring and evaluating RSA do not measure the services provided to high school age students. Although each state is required to report the number of transition age youth (defined as ages 14-24), they are not

required to report the number of youth that are more closely aligned with high school age (e.g. 14-18) or the number of students served while in high school. As a result, it is difficult to identify how significant a role VR plays for this population. RSA conducts annual reviews and periodic on-site monitoring of programs and includes a special focus on transition services and employment outcomes for transition age youth. However, this process does not require the review teams to assess the availability of job search and job placement services for in-school youth.

c. Career and Technical Education

Career and technical education has evolved over the past several decades to combine high academic standards with technical skills. Policy and practicalities limit the amount of hands-on work experience that CTE programs provide to students with disabilities.

1. The Perkins Act of 2006 focuses on school-based technical and vocational education and guidance rather than hands-on work experience in a natural setting. For example, the policy specifically includes provisions for the use of funding for “information and planning resources” that bridge career and technical education to the goals and expectations of consumers, and “guidance” and “counseling” to aid decision making about “training options and preparation” for employment-related goal setting (Carl D. Perkins Career and Technical Education Improvement Act of 2006).
2. Although most stakeholders realized the benefits of authentic work-based educational experiences such experiences are more difficult to provide than are the school-based initiatives (Brown, 2002). As shown in Table 3, most schools offered some work-based experiences. However, fewer offered services that have been shown to be especially beneficial for youth with disabilities such as paid or unpaid internships or job placement services. Even among schools that offer the services, few of the schools report that most or even some of their students with disabilities participated in the programs.

d. Employment and Training Programs/Workforce Investment Act

WIA Youth Programs and other services and programs available within America’s Job Centers have the potential to provide help finding work opportunities for youth with disabilities. However, students with disabilities face two challenges in accessing these services:

1. Many parents and students with disabilities as well as transition coordinators in local education agencies are unaware of services available to youth through the Workforce Investment Act, requirements of equal access, and effective and meaningful participation requirements within WIA and other services and

programs at America's Job Centers. Funding is available through WIA youth programs and other programs through the Job Centers for after school work experience and summer paid internships and employment opportunities. Youth with disabilities qualify for these need-based programs regardless of their parents' income. The disability status triggers the youth's application to take only their individual youth income and not their family's income into account which results in the youth falling into the low-income population which is the priority target group for participation.

2. The performance requirements under WIA youth programs are often viewed as a disincentive to serving youth with disabilities. Math and reading improvement requirements, also known as "Literacy and Numeracy Gains", attainment of a degree and/or certification, as well as placement in education or employment in WIA performance measures remain challenges at a local level that need additional attention. Although performance requirements may be negotiated, there have been few attempts by states to address these issues. Additionally, while guidance has been provided from U.S. DOL-ETA through a Training and Employment Guidance Letter (TEGL 13-09) to the states, Workforce Investment Boards and WIA youth services providers detailing how to increase enrollments of youth with disabilities while still meeting performance measures, this guidance has not been acted upon since its deliverance in February of 2012.

e. Interaction with Social Security Programs

Special education students enrolled in Supplemental Security Income (SSI) through the Social Security Administration will be more likely than those with similar characteristics to remain outside of the labor market both during school and post-school because SSI recipients may lose their cash and health (Medicaid) benefits if they start working (Wittenburg et al., 2002).

In recent years, SSA has designed a number of work incentives to mitigate any negative financial impact of working and promote employment among program recipients including transition-age youth. For example, the Student Earned Income Exclusion allows individuals under the age of 22 to earn up to \$1,700 of earned income per month (\$6,840 per year) without jeopardizing their SSI eligibility. Section 301 allows beneficiaries to remain on SSI while completing an approved vocational rehabilitation program or an individualized education program under IDEA.

In addition, SSA has initiated the Work Incentives Planning and Assistance (WIPA) program that can help youth understand the effect of paid employment on cash benefits and public health insurance and how to use SSA work incentives to mitigate any negative impact. Nevertheless, these work incentives are rarely used and receipt of SSI continues to be a disincentive to work. Currently, the federal authority and funding of WIPA grantees has elapsed.

Few youth access work incentives for a number of reasons:

1. Work incentives are difficult to understand for the individual with significant disabilities and often require the assistance of certified benefit planners to be utilized effectively in order to transfer off benefits or maintain benefits as needed as part of a plan to increase income production and become less dependent on public benefits.
2. Challenges also remain with the process of redetermination of eligibility for Social Security benefits. Work experience while in high school has been found at times as evidence that the individual in question has the ability to work and that their disability is not severe enough to merit determination of continued eligibility for benefits.

5. Recommendations

Multiple programs share responsibility for helping students with disabilities find and maintain a job while in high school. However, limitations exist within each program and in the interaction between the programs. Improving the system requires multiple agencies to make regulatory changes and take administrative actions. This section focuses on modifications to IDEA, Vocational Rehabilitation, and SSA. Although CTE and WIA programs bear some responsibility for the outcome, modifying the three disability programs is likely to have the most significant impact.

1. Modify Section 612(a) of IDEA by adding a new paragraph that requires all states to develop a plan for transition services that describes specific approaches and activities to coordinate services and resources including support of work experience while still in school and the successful transition of youth with disabilities into adulthood. Amend Section 612(a) by adding a new paragraph (26):

The state has established a plan with public input to ensure the State educational agency coordinates efforts with other state agencies including the state Vocational Rehabilitation agency, the state agency responsible for the state Medicaid program, the state Department of Labor, the state Intellectual and Developmental Disabilities agency, and the state Mental Health and/or Behavioral Health agency to increase the availability of resources to support integrated, competitive work experience for students with disabilities beginning at age 16 that provides opportunities to interact continuously with nondisabled coworkers and develops critical skills for work and career readiness as part of successful transition into adulthood post completion of secondary education. Such experiences do not include day habilitation centers, facility based employment and activity settings such as sheltered workshops, or mobile work crews and enclave work

settings. Such a plan details the level and scope of coordinated activities to improve work-based learning experiences, career preparation and skills development, and job experiences in an integrated community setting.

2. Amend the list of services available under the Rehabilitation Act (Section 103a) to include: pre-employment transition services that provide to students with disabilities at a minimum i) job exploration counseling; (ii) work-based learning experience, including in-school and after school work experience, or work experience outside the traditional school setting (such as experience through job training or internships), that is provided in an integrated environment to the maximum extent possible. The Workforce Investment Act of 2012 (H.R.4227), which stalled in the 112th Congress provides the following specific language that clarifies that role that VR should play in pre-employment services (including high school work experience):

“(A) IN GENERAL.—The term ‘pre-employment transition services’ means a coordinated set activities for an eligible student with a disability, designed within an outcome-oriented process, that promotes movement from school to any of the following post-school activities: postsecondary education, vocational training, competitive integrated employment (including supported employment), adult education, adult services, independent living, or community participation.

“(B) SPECIFIC SERVICES.—The term ‘pre-employment transition services’ means a set of services, that is available to students with disabilities, and that makes available, at a minimum— (i) career counseling; (ii) **work-based learning experience, including in-school and after school work experience, or work experience outside the traditional school setting (such as experience through job training or internships),that is provided in an integrated environment to the maximum extent possible;** “(iii) counseling on opportunities for enrollment in a comprehensive transition or postsecondary educational program at an institution of higher education; (iv) school-based preparatory employment experiences such as role playing, social skills development, and independent living training, coordinated with any transition services provided by the local educational agency under the Individuals with Disabilities Education Act (20 U.S.C.8 1400 et seq.); and “(v) training in self-advocacy, individual rights, self-determination skills, and the informed consent process, as well as peer mentoring.

3. Modify performance report requirements for state Education agencies to indicate what number and percentage of students with disabilities have indicated in their IEP the participation in work experience in an integrated community setting to meet post-secondary goals regarding employment and what number and percentage of students actually participated in such work experience for a

minimum of four weeks that is at least 15 hours a week.

4. Modify the reporting requirement of state Vocational Rehabilitation to include school age youth ages 14-18 and modify the Monitoring and Technical Assistance Review to assess the availability and use of job search, job placement and job support services for in-school youth.
5. Instruct the Department of Education and the Department of Labor to issue joint guidance to their respective state agency counterparts that encourages the support of work experiences in integrated community settings as an evidence-based practice that improves post-secondary employment outcomes for students with disabilities.
6. Instruct SSA to issue guidance to their field offices and all SSI and/or SSDI beneficiaries between the ages of 14 and 18 that encourages students with disabilities to seek out and participate in work experience in integrated community settings. The guidance would state clearly the work incentives that can be applied during age 18 re-determination that may demonstrate that although an individual is working their disability continues to impede them from working at a substantial level, indicating eligibility for Social Security disability benefits. In addition, SSA a) expands the student earned income exclusion to disregard all earned income for students under age 22 who are regularly attending school, and b) suspends, until age 22, the age 18 re-determination for any SSI recipient who is working a minimum of 10 hours per week and is regularly attending school.
7. Adopt the Transitioning towards Excellence in Achievement and Mobility (TEAM) legislation introduced in 2011 in Congress would help support greater opportunities for students with disabilities to participate in work experiences as part of transition services and authorize new funding to improve the scope of services available through state and local education agencies as well as the state Vocational Rehabilitation agency.

References

- Baer, R.M., Flexer, R.W., Beck, S., Amstutz, N, Hoffman, L., Brothers, J., Stelzer, D. & Zechman C. (2003). A Collaborative Followup Study on Transition Service Utilization and Post-school Outcomes. *Career Development for Exceptional Individuals*. (26)1.
- Benz, M.R., Lindstrom, L. & Yovanoff, P. (2000). Improving Graduation and Employment Outcomes of Students with Disabilities: Predictive Factors. *Exceptional Children*. 66(4). Accessed July 10, 2012.
- Benz, M,R., Yovanoff, P. & Doren, B. (1997). School-to-work components that predict postschool success for students with and without disabilities. *Exceptional Children* 63(2). Accessed July 9, 2012.
- Brown, B.L. (2002). *School to Work after the School to Work Opportunities Act. Myths and Realities No. 24*. US Department of Education, Educational Resources Information Center (ERIC) Clearinghouse on Adult, Career and Vocational Education. Accessed May 9, 2012 <http://www.eric.ed.gov/PDFS/ED472365.pdf>
- Bureau of Labor Statistics, U.S. Department of Labor. (2005). *The Employment Situation, December 2004*. http://www.bls.gov/news.release/archives/empisit_01072005.pdf
- Bureau of Labor Statistics. (2006). Summer jobs: Where young people worked, July 2005. *Occupational Outlook Quarterly*. Accessed July 8, 2012 <http://www.bls.gov/opub/ooq/2006/summer/oochart.htm>
- Burgstahler, S.J. & Bellman, S. (2009). Differences in perceived benefits of internships for subgroups of students with disabilities. *Journal of Vocational Rehabilitation*. 31 (2009) 155–165
- Cameto, R., Levine, P., & Wagner, M. (2004). *Transition Planning for Students with Disabilities. A Special Topic Report of Findings from the National Longitudinal Transition Study-2 (NLTS2)*. Menlo Park, CA: SRI International. Available at www.nlts2.org/reports/2004_11/nlts2_report_2004_11_complete.pdf.
- Carter, E.W., Trainor, A.A., Cakiroglu, O., Swedeen, B., & Owens, L.A.(2010). Availability of and Access to Career Development Activities for Transition-Age Youth with Disabilities. *Career Development for Exceptional Individuals*. 33(1):13-24.
- Carter, E.W., Trainor, A.A., Ditchman, N., Swedeen, B., Sun, Y. & Owens, L. (2010). Summer Employment and Community Experiences of Transition-age Youth with Severe Disabilities. *Exceptional Children* (76)2:194-212.
- Carter, E.W., Austin, D. & Trainor, A.A. (2011). Factors Associated With the Early Work Experiences of Adolescents With Severe Disabilities. *Intellectual and*

Developmental Disabilities. 49(4): 233–247.

Carter, E.W., Trainor, A.A., Ditchman, N., Swedeen, B. & Owens, L. (2011b). Community-Based Summer Work Experiences of Adolescents With High-Incidence Disabilities. *The Journal of Special Education*. 45(2) 89–103

Data Accountability Center. (2009). Data Tables for OSEP State Reported Data, Part B Child Count. Table 1-1. Accessed July 8, 2012
http://www.ideadata.org/arc_toc11.asp#partbCC

Fraker, T., Mamun, A, Manno, M., Martinez, J., Reed, D., Thompkins, A & Wittenburg, D. (2013). "The Youth Transition Demonstration: Positive One-Year Impacts on Employment in Several Sites" Mathematica Policy Research

Hasazi, S.B., Gordon, L.R., & Roe, C.A. (1985). Factors Associated with the Employment Status of Handicapped Youth Exiting High School from 1979 to 1983. *Exceptional Children*. 51(6):455-469

Joshi, G.S, Bouck, E.C. & and Maeda, Y. (2012). Exploring Employment Preparation and Postschool Outcomes for Student with Mild Intellectual Disability. *Career Development and Transition for Exceptional Individuals*. 35(1) published online 4 April 2012

Levesque, K., Laird, J., Hensley, E., Choy, S.P., Cataldi, E.F., Hudson, L. (2008). *Career and Technical Education in the United States: 1990 to 2005 Statistical Analysis Report* U.S. Department of Education, National Center for Education Statistics

Lowe, S., Morris, M. & Kennedy, M. (forthcoming). *Establishing a National Employment First Policy Framework: A Strategic Roadmap for Improving the Employment Outcomes of Citizens with Significant Disabilities*. Prepared for the U.S. Department of Labor, Office of Disability Employment Policy (ODEP)

Minnesota Governor's Council on Developmental Disabilities (2006). Parallels in Time II: 1950-2005. Accessed July 2, 2012
http://www.mnddc.org/parallels2/four/rehab_act/rehab1.html

Morisi, T.L. (2010). The early 2000s: a period of declining teen summer employment rates. *Monthly Labor Review*. (May), 23-35.

Mortimer, J.T. (2010). The Benefits and Risks of Adolescent Employment. *Prevention Researcher*. (17) 2: 8-11. Accessed June 5, 2012
<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2936460/>

National Center on Workforce and Disability/Adult (2007). *Essential Considerations for Establishing Partnerships Among Agencies Addressing the Employment-Related Needs of Individuals with Disabilities*. Accessed July 8, 2012

<http://digitalcommons.ilr.cornell.edu/gladnetcollect/366/>

National Secondary Transition Technical Assistance Center. (NSTTAC). (2009). NSTTAC Indicator 13 Checklist Form A. Accessed July 20, 2012
<http://www.nsttac.org/sites/default/files/assets/pdf/ChecklistFormA.pdf>

National Council on Disability. (2008). *The Rehabilitation Act: Outcomes for Transition-Age Youth*. Accessed July 7, 2012 <http://www.ncd.gov/policy/employment/>

National Longitudinal Transition Study 2. (2003). NLTS2 data tables. Wave 2 (2003) Parent/Youth Survey, Employment of Youth In-Secondary School in Last Year. Accessed July 20, 2012 <http://www.nlts2.org>

Newman, L., Wagner, M., Cameto, R., & Knokey, A.-M. (2009). *The Post-High School Outcomes of Youth with Disabilities up to 4 Years After High School. A Report of Findings from the National Longitudinal Transition Study-2 (NLTS2) (NCSER 2009-3017)*. Menlo Park, CA: SRI International. Available at www.nlts2.org/reports/2009_04/nlts2_report_2009_04_complete.pdf.

Rabren, K., Dunn, C., & Chambers, D. (2002). Predictors of posthigh school employment among young adults with disabilities. *Career Development for Exceptional Individuals*. 25, pp. 25–40.

Shah, N. (2012). Civil Rights Data Offer Count of Section 504 Students. Accessed June 9, 2012.
http://blogs.edweek.org/edweek/spiced/2012/03/new_data_collected_by_the.html

Shandra, C.L. & Hogan, D.P. (2008). School-to-work program participation and the post-high school employment of young adults with disabilities. *Journal of Vocational Rehabilitation*. 29:117–130.

Silverstein, R. (2000). Major Disability-Related Legislation 1956-2000. *Iowa Law Review*. (85)5.

Social Policy Research Associates. (2004). *The Workforce Investment Act After five years: Results from the National Evaluation of the Implementation of WIA*. Waltham MA. SPR and TATC consulting for the US Department of Labor. Accessed July 8, 2012
http://www.doleta.gov/reports/searcheta/occ/papers/spr-wia_final_report.pdf

The Study Group. (2007). *An assessment of transition policies and practices in state vocational rehabilitation agencies*. Retrieved July 10, 2012, from http://www.vrtransitionstudy.org/docs/VR_Report_9.06.07.pdf

Trainor, A.A., Carter, E.W., Swedeen, B., Owens, L., Cole, O., & Smith, S. (2010). Perspectives of Adolescents With Disabilities on Summer Employment and Community Experiences. *The Journal of Special Education*. 45(3) 157–170

US Department of Education, Office of Special Education Programs. (2011). *Part B State Performance Plan (SPP) and Annual Performance Report (APR) Part B Indicator Measurement Table*. Accessed June 27, 2012

<http://www2.ed.gov/policy/speced/guid/idea/bapr/2012/index.html>

U.S. Department of Education, Office of Special Education and Rehabilitative Services, Rehabilitation Services Administration. (2010) *Vocational Rehabilitation Program FY 2011 Monitoring and Technical Assistance Guide*. Accessed July 2 2012,

<http://www2.ed.gov/rschstat/eval/rehab/107-reports/index.html#mtag>

US Department of Education. (2012). *RSA: Monitoring of the Vocational Rehabilitation Program Required under Section 107*. Retrieved July 2, 2012

<http://www2.ed.gov/rschstat/eval/rehab/107-reports/index.html> and *RSA: Monitoring on the Vocational Rehabilitation and Independent Living Programs for FY 2010 and earlier Required under Section 107* Retrieved July 2, 2012

<http://www2.ed.gov/rschstat/eval/rehab/107-reports/prior.html>

US Department of Education. (2012). *Part B State Performance Plans (SPP) Letters and Annual Performance Report (APR) Letters*. Accessed July 20, 2012

<http://www2.ed.gov/fund/data/report/idea/partbspap/allyears.html#ak>

US Department of Labor , Bureau of Labor Statistics. (2012b). *Databases, Tables & Calculators by Subject. Labor Force Statistics from the Current Population Survey. Series Id: LNU02300012, Series title: (Unadj) Employment-Population Ratio - 16-19 yrs. Age: 16 to 19 years.*

US Department of Labor, Employment and Training Administration. (2009). *Workforce Investment Act (WIA) Performance Measures*. Accessed July 3, 2012

<http://www.doleta.gov/performance/quickview/WIAPMeasures.cfm>

US Department of Labor, Office of Disability Employment Policy (2012a). *Disability Employment Policy Resources by Topic: Youth Employment Rate*. Accessed July 8,

2012. <http://www.dol.gov/odep/categories/youth/youthemployment.htm>

Wagner, M., Blackorby, J., Cameto, R. & Newman, L. (1993). *What Makes a Difference? Influences on Postschool Outcomes of Youth with Disabilities: The Third Comprehensive Report from the National Longitudinal Transition Study of Special Education Students*.

Prepared by SRI International for the Office of Special Education Programs, U.S.

Department of Education. Accessed June 5 <http://eric.ed.gov/PDFS/ED365085.pdf>

Wittenburg, D.C., Golden, T. & Fishman, M. (2002). *Transition options for youth with disabilities: An overview of the programs and policies that affect the transition from school. Journal of Vocational Rehabilitation. 17:195–206*

