



Michigan Interagency Agreement Detailed

Collaboration Roles and Responsibilities

The Vocational Rehabilitation (VR) agencies and, as appropriate, intermediate school districts (ISDs), LEAs, Michigan School for the Deaf (MSD), juvenile justice systems (JJ), and state hospitals will work to collaborate and coordinate services to students with disabilities (SWDs), also referred to as **public agencies***, which encompass the following:

- Pre-ETS
- Consultation and technical assistance (TA) to assist and coordinate services related to planning for the transition of SWDs.
- Transition planning between agencies that will facilitate and include to the maximum extent possible, a coordinated approach to development and implementation of SWDs Individualized Education Program (IEP) and provision of services.
- Outreach to and identification of SWDs in need of Pre-ETS, transition services and other VR services as determined appropriate for each SWD.
- Documentation requirements regarding SWDs who are seeking subminimum wage employment
- Assurance neither the SEA and/or ISDs will enter an arrangement with an entity holding a special wage certificate.

VR will collaborate and coordinate with the public agencies* to arrange Pre-ETS unless such services are otherwise provided by the public agencies* as part of IDEA/FAPE programming.

Pre-ETS

Pre-ETS consists of:

- Instruction in self-advocacy
- Job exploration counseling
- Work-place readiness training
- Work-based learning experiences
- Counseling on opportunities for enrollment in comprehensive transition or post-secondary education programs at Institutions of Higher Education (IHEs)



SWDs may receive Pre-ETS in a variety of settings and ways delivered individually or in groups including but not limited to services from:

- Vocational Rehabilitation Professionals
- Qualified service providers when authorized by VR.
- MRS Michigan Career and Technical Institute located in Plainwell, Michigan.
- BSBP Training Center located in Kalamazoo, Michigan.

VR shall coordinate Pre-ETS or VR services with SWDs, parents, teachers, ISD or LEA personnel



Any of the following entities can offer SWDs the opportunity to apply for a VR case and provide information to families and students detailing the benefits of application:

- Vocational Rehabilitation Professionals
- Qualified service providers when authorized by VR.
- MRS Michigan Career and Technical Institute
- BSBP Training Center Parents
- Teachers
- ISD
- LEA personnel

Consultation and technical assistance (TA)

Michigan Department of Education (MDE) OSE agrees to:

- Be the point of contact for collaboration with Special Education Instructional Leadership Network (SEILN) and VR
- Strengthen collaboration and coordination between ISDs/LEAs and VR
- Make reference materials available through the Catamaran Training Site and Family Matters to school districts and other stakeholders relating to transition planning and may include the VR provision of Pre-ETS and other transition services.
- Establish collaboration between SEILN and VR on training needs

Disseminate this Agreement to MDE OSE staff and the MDE OSE grant funded initiatives



VR may provide training, consultation, and/or TA to public agencies* to assist in planning for the transition of SWDs from school to post-school activities. Training, consultation, and TA may consist of but not limited to:

- Pre-ETS
- VR application, eligibility determination, and additional VR services
- VR policies and procedures
- 511 requirements
- CIE
- Community-based services
- Career pathways
- Employment related accommodations
- Disability awareness
- Independent living
- Local/Statewide Resources



Public agencies* may provide training, consultation, and/or TA to VR to assist in the planning for the transition of SWDs from school to post-secondary education, employment, Pre-ETS, and other individual VR services.

The preferred method of delivery, frequency of training, consultation, and TA shall be mutually agreed upon by the public agencies*. The cost of training, consultation, and TA shall be the responsibility of the providing agency unless otherwise agreed to by the parties.

Referral Processes

The public agencies* agree to promote delivery of Pre-ETS and individual VR services through joint efforts to develop and coordinate local referral procedures. VR accepts referrals of SWDs in need of Pre-ETS or individual VR services during the transition planning process.

VR will:

- Identify a local contact(s) for referrals from the public agencies*
- Provide public agencies* with referral forms and information on Pre-ETS and individual VR transition services
- Encourage coordination planning between public agencies* and VR for the effective documentation of a disability qualifying SWDs for the provision of Pre-ETS and/or copy of the IEP or 504 plans.
- Process referrals according to VR policies and procedures



MDE OSE will be the point of contact for collaboration with SEILN and VR regarding identification and coordination of referrals to VR for students with disabilities eligible under the IDEA. SEILN Directors may also serve as the point of contact for information pertaining to Section 504.



Who is Eligible:

A potentially eligible student is a student who meets the criteria as a SWD and in need of Pre-ETS, but has not applied, or been determined eligible for VR services.

Or

An eligible student is a student who meets the criteria as a SWD and has applied and been determined eligible for individual VR services.

Coordination of Resources

VR will:

- Coordinate with the public agencies* to identify the 5 required Pre-ETS where VR could assist and collaborate to enhance opportunities for SWDs, if needed.
- Coordinate with public agencies* to identify SWDs who may benefit from Pre-ETS or individualized VR services.
- When invited, attend in-person or by other means, IEP Team meetings with appropriate consent and advance notice.



MDE OSE will be the point of contact for collaboration and coordination with SEILN and VR regarding:

- planning between public agencies* to minimize duplication and maximize resources, services, and opportunities for SWDs to achieve post-secondary outcomes.
- planning between public agencies* for the effective documentation of a disability qualifying SWDs for the provision of Pre-ETS and/or copy of the IEP.
- public agencies* inviting VR to IEP Team meetings, as appropriate, with consent and advance notice.

Comparable Benefits

Services and benefits provided or paid for, in whole or in part, by other agencies, by health insurance, or by employee benefits must be explored.

public agencies* have the responsibility to access comparable benefits when providing transition services to eligible customers as long as services are not duplicated and used as stated under the providing agencies regulations. So long as:

- The service(s) concurrently provided by a provider network are intended to supplement/complement service(s) provided by VR.
- There is no duplication of payment for the same service element(s); and
- There is no duplication of payment for the delivery of face-to-face services provided to an individual during a specific period (e.g. the same 15-minute unit of time).



A provider network may provide transition services prior to the completion of assessments and eligibility determination by VR. VR may provide vocational rehabilitation services prior to the completion of eligibility for services from a provider network.

Subminimum Wage

VR will:

- Limit placement of eligible individuals into subminimum wage employment to ensure individuals with disabilities have opportunities and access to information and services assisting with achieving CIE.
- Adhere to United States Department of Labor (USDOL) procedures. VR will document existing section 14(c) holders through bi-annual reports available through USDOL.
- Continue to use the existing process identified in the roles and responsibilities to document the completion of actions required for youth under this agreement.
- Ensure the public agencies* do not enter a contract or other arrangement with a section 14(c) certificate holder for the purpose of operating a program for an individual who is under age 24 which is compensated at a subminimum wage. On an annual basis, all parties should confirm no such agreements are in place or established.



Public agencies* will work collaboratively to ensure the student has been afforded the opportunity to pursue CIE and has documentation indicating completion of each of the following actions:

- a. Completion of all IDEA services and/or completion of Pre-ETS available to the student through VR; and
- b. Has completed a VR case resulting in:
 - The student was determined to be ineligible/unable to benefit from VR services and the case has been closed; or
 - The student was determined eligible for VR services, an IPE was developed along with services provided towards an employment outcome resulting in case closure due to an inability to achieve the employment outcome; and
 - VR has provided/documented the SWD has received career counseling, and information and referrals to federal and state programs and other resources in the student's geographic area that offer employment-related services and supports designed to enable the individual to explore, discover, experience, and attain CIE.



Activities and Documentation Requirements

SWDs considering subminimum wage employment upon exiting secondary education should be referred to VR. When appropriate, VR may request documentation from

education for purposes related to this section. VR will collect and document the necessary prerequisites, corresponding services, and information required for SWDs seeking subminimum wage employment.



Documented activities must minimally include:

- A description of Pre-ETS and transition services available.
- Assist with a VR application and eligibility documentation.
- Development of an IPE for eligible SWDs.
- Provide outcomes of the IPE and case record material, provide career counseling, and information and referral services, and offer informed choice.



LEA Responsibilities

Prior to Youth starting employment:

Obtain documentation to demonstrate a youth with a disability (specifically in Michigan 14-26) completed the actions in previous slide, a local educational agency must provide VR with documentation the youth has received transition services under IDEA. The documentation must be provided to VR in a manner that complies with confidentiality requirements of the FERPA and IDEA.

The documentation of completed services or activities must, at a minimum, contain:

- (i) Youth's name
- (ii) Description of the service or activity completed
- (iii) Name of the provider of the service or activity
- (iv) Date service or activity completed
- (v) Signature of educational personnel documenting completion of the service or activity
- (vi) Date of signature
- (vii) Signature of educational personnel transmitting documentation to VR
- (viii) date and method of submission to VR.



In the event a youth with a disability or, as applicable, the youth's parent or guardian, refuses, through informed choice, to participate in the activities required by this part, such documentation must, at a minimum, contain the—

- (i) Youth's name
- (ii) Description of the refusal and the reason for such refusal
- (iii) Signature of the youth or, as applicable, the youth's parent or guardian
- (iv) Signature of the educational personnel documenting the youth's refusal

- (v) Date of signatures
- (vi) Signature of educational personnel transmitting documentation of the refusal to the VR
- (vii) Date and method of submission to VR.



The educational personnel must submit the required documentation to VR as soon as possible upon completion of each required actions, but no later than:

- 30 calendar days after the completion of the activity or service, or (b) 60 calendar days, if additional time is necessary due to extenuating circumstances, such as illness or family emergency, etc.
- When a youth has refused to participate in an action, documentation must be provided to VR within 5 calendar days of the youth's refusal to participate.
- When submitting final documentation to VR regarding services provided to the youth, the educational personnel must provide an itemized cover sheet.
- The educational agency must retain a copy of all documentation provided to VR.

Non-Disclosure of Confidential Information

Each party must use its best efforts to assist the other party in identifying and preventing any unauthorized use or disclosure of any Confidential Information and will make best efforts to comply with regulatory requirements, internal policies or procedures, and all other applicable standards related to such disclosures.

Dispute Resolution

The parties will endeavor to resolve any IA dispute in accordance with this provision. The dispute will be referred to the parties' respective program managers. Such referral must include a description of the issues and all supporting documentation. The parties must submit the dispute to a senior executive if unable to resolve the dispute within 15 business days. The parties will continue performing while a dispute is being resolved unless the dispute precludes performance



- Public agencies* will follow an informal dispute resolution process for financial reimbursements related to services.

- Disputes regarding services identified in both a student's Individualized Education Program (IEP) and a Vocational Rehabilitation (VR) Individualized Plan for Employment (IPE) should be resolved locally.
- If a service is related to special education and included in the IEP, the school district may provide the service or request VR's involvement, depending on the educational versus employment focus.
- VR's funding for specific services like assessments and job placement is exempt from comparable benefits and financial needs tests.
- Assistive technology for educational purposes is the financial responsibility of public agencies*, while VR will assess needs for vocational purposes prior to high school exit.
- In cases of disagreement about financial responsibility, an informal dispute resolution process will be followed, and parents or guardians have the right to appeal decisions made by either VR or the school district.