

## Discussion

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# The promise and the challenge of pre-employment transition services: The Workforce Innovation and Opportunity Act after ten years

Joshua P. Taylor\* and Holly N. Whittenburg

*Department of Teaching and Learning, Washington State University, Pullman, WA, USA*

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**Abstract.** As we mark the 10th anniversary of the passage of the Workforce Innovation and Opportunity Act of 2014 (WIOA), one of its marquee policies—pre-employment transition services (Pre-ETS)—remains a work in progress. WIOA focused on achieving competitive integrated employment (CIE) for people with disabilities by establishing it as the primary goal for services and by reallocating resources and emphasizing coordinated service delivery to bend the trajectories of youth with disabilities toward CIE and minimize segregated and subminimum wage alternatives. However, along with the promise of opportunity and innovation, WIOA has introduced challenges and complexity in implementing Pre-ETS and other requirements. In this paper, we describe the promise of WIOA and Pre-ETS as well as many of these ongoing challenges related to its implementation. Finally, we provide recommendations for how federal and state leaders can build on the innovation occurring within Pre-ETS implementation to improve outcomes and achieve the promise WIOA set forth.

**Keywords:** Transition, employment, policy, vocational rehabilitation, special education

### 1. Introduction

As we mark the 10th anniversary of the passage of the Workforce Innovation and Opportunity Act of 2014 (WIOA), one of its marquee policies—the provision of pre-employment transition services (Pre-ETS) to students with disabilities through the vocational rehabilitation (VR) system—remains a work in progress. In assessing the first decade-long impact of Pre-ETS, it is important to consider a disability employment support system that was his-

torically largely fragmented and disjointed—made up of 45 different federal programs overlapping in outcome aims, services, and eligibility criteria (Government Accountability Office [GAO], 2012). Employment outcomes for youth with disabilities had remained dismal and stagnant for several decades with many youth with intellectual and developmental disabilities continuing to transition from school into sheltered workshops where they would earn subminimum wages (Wehman et al., 2018; Winsor et al., 2021).

In this landscape, Congress consulted with leaders in the field and set out to restore the promise of the Rehabilitation Act to ensure the meaningful and

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\*Address for correspondence: Joshua P. Taylor, Department of Teaching and Learning, Washington State University, Pullman, WA 99164, USA. E-mail: josh.taylor@wsu.edu.

widespread inclusion of people with disabilities in the workforce. Policymakers envisioned a comprehensive offering of the services, skills, knowledge, and experiences youth with disabilities needed to be successful at work based on the research literature. This vision was reflected in the selection of the five required Pre-ETS activities, as well as the mandate to divert attention to a younger population of youth with disabilities who are potentially eligible for VR services. WIOA dramatically restructured how employment-related services to transition-aged students with disabilities would be delivered and to whom services would be targeted. Mandated collaboration with schools and more intentional coordination with other entities would require not only a broader super-coalition of agencies but also a focus on coordinated service delivery to students themselves. One of the goals of this collaboration was to get services delivered quickly and efficiently while seeking to reduce procedural inefficiencies within the traditional VR application and eligibility system. WIOA (2014) represented a monumental reconceptualization of how to deliver employment services to students with disabilities—complete with funding and accountability mandates (e.g., the 15% Pre-ETS set aside) to ensure adequate resources for this scope of systems change. These factors highlight some of the complexities inherent in the promise and the challenge presented by WIOA, particularly in implementing Pre-ETS over the past decade. It is a set of policies that is ambitious in aim and scope, rigorous in increasing accountability, but less than explicit in guiding states on how to accomplish its goals and mandates.

## 2. The promise

At its core, WIOA is focused singularly on achieving competitive integrated employment (CIE) for people with disabilities. Its authors set about doing this in two ways: (a) establishing CIE as the primary goal and aim of VR services and (b) reallocating resources and emphasizing coordinated service delivery to bend the trajectories of youth with disabilities toward CIE and minimize segregated and subminimum wage alternatives. Although the formulation of Pre-ETS and its sometimes daunting 15% budget set aside may overshadow it, the establishment of CIE as the primary aim is an equally impactful directive of WIOA due to the historically fractured nature of vocational services and aims across state and federal systems (GAO, 2012). In conjunction with the

policy emphasis on coordination, the CIE directive not only affects Pre-ETS and VR-based services but also potentially has an ancillary effect of steering other vocational services toward CIE. Additionally, in responding to the need for earlier transition services, WIOA mandates push VR to become a partner in working with younger students, thus positioning CIE as a transition goal for students still early enough to shift planning to reach this goal. Coordinated service delivery is pivotal to these efforts as Pre-ETS providers must collaborate with school staff, students, and families to ensure these services offer students the skills, knowledge, and experiences to develop and achieve their individualized career goals. These policy directives hold great promise for changing the outcomes of youth with disabilities by promoting innovation in the systems that support them. However, these systems must not only change at the federal level but even more critically at state and local levels. Although much attention has been paid to WIOA's mandates and the 15% required budget set aside, WIOA also provides tremendous latitude to states in interpreting these broad directives to fit them to state and local contexts. This combination of hard funding mandates and required Pre-ETS activities has created a landscape ripe for innovation, and many state VR agencies have responded by creating new programming and expanding partnerships (Taylor et al., 2022).

## 3. The challenge

However, along with the promise of opportunity and innovation, WIOA has introduced challenges and complexity in implementing Pre-ETS and other requirements. In particular, state VR agencies have had to (a) provide a new set of services (i.e., Pre-ETS), (b) engage a new population broader than their previous scope, and (c) clear a substantial financial hurdle each fiscal year in allocating 15% of budgets to these new endeavors. For VR agencies, this expanded population of “potentially eligible” youth is often younger than previous clients and has a wider range of disabilities, which may strain staff clinical expertise (Awsumb et al., 2020; Carter et al., 2021). As the numbers of potential clients have expanded due to these broader criteria of potentially eligible youth, it has also stretched the capacity of staff to provide services while also coordinating more purposefully with a larger number of partners (Awsumb et al., 2020; Carter et al., 2021). As a result of

these and other factors, many state VR agencies have struggled to consistently meet the 15% Pre-ETS budget allotment from year to year (Rehabilitation Services Administration, N.D.). In addition to these challenges, Pre-ETS delivery itself represents a significant departure from traditional areas of expertise and experience in VR service delivery models. In essence, WIOA requires that a system largely focused on individualized case management, counseling, and one-on-one service delivery to rapidly begin to incorporate short-term, group-based services focused on a wider range of skills and experiences (e.g., self-advocacy instruction, counseling on postsecondary education and training opportunities).

As we consider these factors, research has shown that states have varied widely in how they have prioritized WIOA implementation in general (Taylor et al., 2022), Pre-ETS delivery in particular (Whittenburg et al., 2024), and the degree to which they have incorporated research-based practices in Pre-ETS planning (Whittenburg et al., 2023). Additionally, there is significant variation in *who* provides Pre-ETS within states, with some states providing all services through VR staff, others providing all services through vendor-purchased service agreements, and the majority through a combination of the two (Whittenburg et al., 2024). To further the complexity, some states are experimenting with VR-funded school-based personnel (Awsumb & Carter, 2024). However, little research or definitive evaluative efforts have been dedicated to determining what works best and how services should be delivered.

#### **4. Leveraging innovations to improve outcomes**

The complexity of federal and state VR systems requires a similarly complex response in how we evaluate the effectiveness of these systems to respond to the promise and challenge of WIOA's Pre-ETS mandates. As a field, we need methods of evaluating the still-evolving models of service delivery that agencies and providers are testing, innovating, expanding, and refining. This evaluation should not only blindly sort effective from ineffective practices, but also highlight innovative, nimble, and efficient ways that states, regions, and local communities have responded to the complex challenges of fitting implementation into their unique contexts. Relatedly, we need new approaches to providing training and technical assistance that align with the specific innovative

approaches states and localities are using to provide Pre-ETS. In these evaluative efforts, it is also important to recognize that there are aspects of this system that have yet to be fully implemented in terms of the population being reached (e.g., low engagement of students with 504 plans) and specific services offered (e.g., limited delivery of work-based learning experiences). Overall, we have yet to identify the key features of this policy that make it work in practice in a variety of unique contexts.

To these ends, more comprehensive Pre-ETS-specific assessment and evaluation of Pre-ETS are needed to first determine the efficacy and efficiency of services and outcomes and then proliferate their implementation nationally (Fleming et al., 2024; Poppen et al., 2024). Alongside these evaluative efforts, further efforts are needed to translate transition-based research into practice in the planning and provision of Pre-ETS (Rooney-Kron et al., 2024). Better understanding is needed of who is providing services and what education and training they are receiving to prepare them to provide effective services to students with disabilities (Awsumb & Carter, 2024; Whittenburg et al., 2024). Assessment of these practices should include systems change efforts related to training and technical assistance provided to VR staff and other Pre-ETS providers (Lau et al., 2024). Providing Pre-ETS in stages of learning that enhance coordinated service delivery and reflect individualized student interests can help ensure that students benefit not only from introductory career exploration activities but have an opportunity to engage in work-based learning and enrollment in postsecondary education—the types of activities shown by extensive research to strongly promote CIE (Rowe et al., 2024). There is a critical need to examine the differential experiences and outcomes of youth from diverse groups to ensure equity of service delivery and better align VR and Pre-ETS with culturally-responsive and sustaining practices (Castro Rios et al., 2024). Finally, to chart a path forward, policy implementation must incorporate the sum of stakeholder perspectives and research-validated approaches to achieving CIE (Wehman et al., 2024).

WIOA and its Pre-ETS provisions mark a tremendous push forward to improve CIE outcomes for youth with disabilities through a massive reconceptualization and expansion of how VR services are provided to students with disabilities. WIOA's mandates could change the trajectories of youth with disabilities across the United States, however, there

is still much work to be done to make the promise of Pre-ETS a reality. Given specific challenges around scaling up Pre-ETS, providing targeted professional development, and identifying best practices across a wide range of structures and contexts, considerable sustained efforts will be needed to find a collective path to substantially increase in CIE for youth with disabilities. The recently awarded Disability Innovation Fund (DIF) grants could hold great potential in plotting this path, as they provide funding to state, school, and VR partners to develop innovative collaborative models to improve and expand access to employment-related transition services, including work-based learning experiences. Further promise lies in refining models that states are using at various levels of implementation that could then be disseminated widely to other states through technical assistance efforts. Most importantly though, researchers and policymakers alike should be aware that the path forward must take into account the specific strengths, needs, and experiences of the many state, regional, and local VR and school providers who have been tasked with the complexities of making this promise real.

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### References

- Awsumb, J. M. & Carter, E. W. (2024). Pre-Employment Transition Services: Provider experiences with design and delivery. *Journal of Vocational Rehabilitation*, 60(2).
- Awsumb, J. M., Carter, E. W., Schutz, M. A., & McMillan, E. D. (2020). Perspectives of pre-employment transition services providers on preparing youth with disabilities for employment. *Journal of Vocational Rehabilitation*, 53(2), 205-218. <https://doi.org/10.3233/JVR-201097>
- Carter, E. W., Awsumb, J. M., Schutz, M. A., & McMillan, E. D. (2021). Preparing youth for the world of work: Educator perspectives on pre-employment transition services. *Career Development and Transition for Exceptional Individuals*, 44(3), 161-173. <https://doi.org/10.1177/2165143420938663>
- Castruita Rios, Y. & Estala-Gutierrez, V. (2024). Unraveling the factors influencing engagement in vocational rehabilitation services among transition-age Hispanic youth: An exploratory study. *Journal of Vocational Rehabilitation*, 60(2).
- Fleming, A. R., Phillips, B. N., Riesen, T., & Langone, A. (2024). Enhancing transition outcomes: A toolkit to facilitate data-driven Pre-Employment Transition Services. *Journal of Vocational Rehabilitation*, 60(2).
- Government Accountability Office. (2012). *Employment of People with Disabilities: Little Is Known about the Effectiveness of Fragmented and Overlapping Programs*. Retrieved from <https://www.gao.gov/products/gao-12-677>
- Lau, S., McKelvey, S., Gokita, T., Ramsey, H., & Mosley, D. (2024). Facilitators and barriers of Pre-ETS implementation: Preliminary findings and recommendations. *Journal of Vocational Rehabilitation*, 60(2).
- Poppen, M., Sheftel, A., Lindstrom, L. E., Rowe, D. A., Unruh, D., & Mazzotti, V. L. (2024). Transition Self-Assessment Tool: The development and field testing of a statewide assessment of Pre-Employment Transition Services. *Journal of Vocational Rehabilitation*, 60(2).
- Rehabilitation Services Administration (N.D.). *Vocational Rehabilitation State Grant Awards*. Retrieved from <https://rsa.ed.gov/about/programs/vocational-rehabilitation-state-grants/awards>
- Rooney-Kron, M., Malouf, E. T., Brenner, H., Taylor, J., Whittenburg, H., Carlson, S., & Avellone, L. (2024). A scoping review of Pre-Employment Transition Services for transition aged youth with disabilities. *Journal of Vocational Rehabilitation*, 60(2).
- Rowe, D. A., Diehl, M., & Fowler, C. H. (2024). Leveraging the stages of learning to optimize Pre-Employment Transition Service delivery. *Journal of Vocational Rehabilitation*, 60(2).
- Taylor, J. P., Whittenburg, H. N., Rooney-Kron, M., Gokita, T., Lau, S. J., Thoma, C. A., & Scott, L. A. (2022). Implementation of pre-employment transition services: A content analysis of Workforce Innovation and Opportunity Act state plans. *Career Development and Transition for Exceptional Individuals*, 45(2), 60-70. <https://doi.org/10.1177/2165143421993027>

- Wehman, P., Tansey, T., Taylor, T., Parent-Johnson, W., Whittenburg, H., & Averill, J. (2024). Building a foundation for competitive integrated employment: What does the future hold for Pre-employment Transition Services. *Journal of Vocational Rehabilitation, 60*(2).
- Wehman, P., Taylor, J., Brooke, V., Avellone, L., Whittenburg, H., Ham, W., Brooke, A. M., & Carr, S. (2018). Toward competitive employment for persons with intellectual and developmental disabilities: What progress have we made and where do we need to go. *Research and Practice for Persons with Severe Disabilities, 43*(3), 131–144. <https://doi.org/10.1177/1540796918777730>
- Whittenburg, H. N., Avellone, L., Taylor, J. P., Park, S., Poppen, M., Castruita Rios, Y., & Tansey, T. (2024). State-level characteristics and trends in Pre-Employment Transition Service delivery to students with disabilities. *Journal of Vocational Rehabilitation, 60*(2).
- Whittenburg, H. N., Rooney-Kron, M., Carlson, S. R., Malouf, E. T., & Taylor, J. P. (2023). Use of research-based transition recommendations for youth with disabilities in Workforce Innovation and Opportunity Act plans. *Rehabilitation Counseling Bulletin*. Advance online publication. <https://doi.org/10.1177/00343552231155218>
- Winsor, J., Timmons, J., Butterworth, J., Migliore, A., Domin, D., Zalewska, A., & Shepard, J. (2021). *StateData: The National Report on Employment Services and Outcomes Through 2018*. University of Massachusetts Boston.