



October 1, 2025

TO: BOCES District Superintendents
School District Superintendents
Superintendents of Special Act School Districts
Superintendents of State-Operated Schools
Superintendents of State-Supported Schools
Public School Administrators
Charter School Leaders
Special Education Directors
Chairpersons of Committees on Special Education
Chairpersons of Committees on Preschool Special Education
Administrators of Nonpublic Schools with Approved Special Education Programs
Organizations, Parents, and Individuals Interested in Special Education

FROM: Ceylane Meyers-Ruff *Ceylane Meyers-Ruff*

SUBJECT: Pre-Employment Transition Services (Pre-ETS) for Students with Disabilities

This field memorandum is to inform you that the New York State Education Department (NYSED) has developed the attached policy brief, *Pre-Employment Transition Services*. This document is intended to remind Committees on Special Education and school districts of the importance of interagency collaboration between State educational agencies (SEA), local educational agencies (LEA), and State vocational rehabilitation (VR) agencies. State and local educational agencies share the responsibility for transition planning and services with VR agencies¹ and by working together, can ensure that students with disabilities receive comprehensive support tailored to their individual needs, preparing them for a successful transition into adulthood.

In New York State (NYS), [Adult Career and Continuing Education Services-Vocational Rehabilitation](#) (ACCES-VR) at NYSED and the [NYS Commission for the Blind](#) are the VR agencies that provide Pre-ETS for students with disabilities. Effective cooperation between these entities, SEAs, and LEAs is essential to promoting a seamless delivery of transition services, ultimately leading to successful post-school outcomes. Enhanced communication and shared resources can streamline processes and create a more inclusive environment, fostering greater opportunities for all students with disabilities as they navigate life after high school.

¹ Transition planning and services are mandated for both education agencies [through the Individuals with Disabilities Education Act (IDEA)] and VR agencies [through the Workforce Innovation and Opportunity Act (WIOA) and Amendments to the Rehabilitation Act of 1973].

In January 2025, the Office of Special Education and Rehabilitative Services (OSERS) of the United States Department of Education issued [Coordinating Transition Services and Postsecondary Access, Guidance on Requirements under the IDEA and the Rehabilitation Act](#) which describes how SEAs, LEAs, and State VR agencies may coordinate to assist students with disabilities who will potentially receive services as an adult.

Schools are strongly encouraged to use the guidance and resources provided in these documents to assist them collaborating with VR agencies for the provision of Pre-ETS for students with disabilities.

Questions regarding this memorandum may be directed to speced@nysed.gov, the Special Education Policy Unit at (518) 473-2878, or the regional [ACCES-VR Transition and Youth Services Senior VR Counselor](#).

Attachment: Pre-Employment Transition Services



The University of the State of New York
New York State Education Department
Office of Special Education and ACCES

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Pre-Employment Transition Services

This is one in a series of policy briefs prepared by the New York State Education Department on topics pertaining to implementation of the Individuals with Disabilities Education Act (IDEA) in New York State and Part 200 of the Regulations of the Commissioner of Education relating to students with disabilities.

What are Pre-ETS?

Pre-Employment Transition Services (Pre-ETS) are designed to address the career development needs of students with disabilities. Pre-ETS prepare students with disabilities for employment by exploring their post-secondary education options, developing their employment related job readiness skills, and using real work to provide the knowledge and skills that will help them connect school experiences to real-life work activities and future career opportunities. Pre-ETS provide a meaningful way to enhance the development of a student's career direction. The goal for Pre-ETS is to prepare students to become engaged in their own transition and vocational planning as well as for successful long-term employment consistent with their individual strengths, abilities, interests, and informed choice. The five required Pre-ETS are:

- Job exploration counseling;
- Work-based learning experiences, which may include in-school or after school opportunities, or experience outside the traditional school setting (including internships) provided in a competitive integrated employment setting
- Counseling on opportunities for enrollment in comprehensive transition or postsecondary educational programs at institutions of higher education;
- Workplace readiness training to develop social skills and independent living; and
- Instruction in self-advocacy, (including instruction in person-centered planning), which may include peer mentoring.

Who qualifies for Pre-ETS?

All students with disabilities, including those who have applied and been found eligible for VR services, and those that have not yet applied but remain potentially eligible (PE) for ACCES-VR services qualify for Pre-ETS.

Students with individualized education programs (IEP) and those with Section 504 Plans may participate in Pre-ETS.

What are recognized educational programs?

Students may receive Pre-ETS when they are participating in a recognized educational program, which may include:

- Secondary education programs
- Non-traditional or alternative secondary education programs, including home schooling
- Other recognized educational programs, such as those offered through the juvenile justice system.

Who provides Pre-ETS?

For PE students, Pre-ETS are delivered by community-based providers or vendors funded by ACCES-VR. For students who are already receiving services from ACCES-VR, Pre-ETS can be provided by both community-based providers and/or ACCES-VR counselors.

What is a Pre-ETS vendor?

A vendor or community-based provider is contracted by ACCES-VR to provide Pre-ETS. Vendor staff must meet training requirements prior to providing services and complete ongoing training requirements to maintain proficiency. Vendor staff deliver Pre-ETS using a syllabus or curriculum approved by ACCES-VR.

Vendors work in partnership with the student, their family, the school, and any other agencies involved with the student to identify which Pre-ETS the student will receive.

How can students access Pre-ETS?

Students with disabilities can access Pre-ETS as either a PE student with a disability or a VR eligible student with a disability already working with ACCES-VR. To access Pre-ETS as a PE student, the school can connect the student directly to an approved Pre-ETS vendor. For students who are VR eligible, the student's Vocational Rehabilitation Counselor makes arrangements for Pre-ETS.

See also: "How can school districts arrange Pre-ETS?" section below.

When can Pre-ETS occur?

Students with disabilities can begin participating in Pre-ETS as early as age 14 while the student is enrolled in an educational program. A student receiving Pre-ETS cannot exceed the age of 22. For students enrolled in secondary school, Pre-ETS may be delivered in either the educational setting during the school day, or outside of the educational setting, including after school, school breaks, summer vacation or weekends.

What is an LEA's responsibility for Transition Planning under IDEA?

The delivery of Pre-ETS is not intended to shift the responsibility of service delivery from LEAs to ACCES-VR. The school district will continue to be responsible for providing transition planning and educational services.

LEAs are responsible for providing and paying for any transition service that is considered special education or related services necessary for ensuring a free appropriate public education (FAPE) as required under IDEA.

IDEA lays out a process for the design and delivery of transition services for students with disabilities. For individual students, this process is driven by the development of an IEP.

In New York, transition services must be provided in accordance with [Section 200.4\(d\)\(ix\) of the Regulations of the Commissioner of Education](#) beginning with the first IEP to be in effect when the student turns age 15 (and at a younger age, if determined appropriate) and updated annually. The IEP must include:

- a statement (under the student's present levels of performance) of the student's needs, taking into account the student's strengths, preferences, and interests, as they relate to transition from school to post-school activities;
- appropriate measurable postsecondary goals;
- a statement of needed transition services;
- needed activities to facilitate the student's movement from school to post-school activities; and
- a statement of the responsibilities of the school district and, when applicable, participating agencies for the provision of services and activities that promote movement from school to post-school opportunities, or both, before the student leaves the school setting.

How do LEAs collaborate with participating agencies for the delivery of Pre-ETS?

A participating agency is a State or local agency, other than the school, such as ACCES-VR and NYSCB, which is financially and legally responsible for providing transition services, including Pre-ETS, to students with disabilities.

LEAs, VR staff and contracted Pre-ETS vendors must work in collaboration to ensure a coordinated approach to the provision of all transition services, to eliminate the duplication of assessments, services, and reporting requirements, and to promote increased access to Pre-ETS for all students with disabilities.

To the extent possible, LEAs should assist in the collection of documents and information (i.e., assessments and IEPs) that will expediate VR's ability to provide services to students with disabilities.

How do Pre-ETS supplement the transition services provided under IDEA?

Pre-ETS provided by VR agencies may not duplicate or supplant services that are already provided by LEAs through IDEA.

LEA staff should consider the following questions to guide decision making when collaborating with VR on the delivery of Pre-ETS:

- Is the purpose of the service related to an employment outcome or education?
- How should the need for VR services be documented on the IEP?
- Is the service usually considered a special education or related service, such as transition planning necessary for the provision of FAPE?

- Is the service one that the LEA customarily provides under Part B of IDEA?

How are Pre-ETS included in a student's IEP?

IDEA defines transition services as a coordinated set of activities for a student with a disability that is designed to be within a results-oriented process, focused on improving the academic and functional achievement of the student with a disability to facilitate the student's movement from school to post-school activities, including postsecondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation.

In the IEP, the coordinated set of activities summarizes in one place how the student's transition needs that are identified in the present levels of performance are being addressed comprehensively to facilitate the student's movement from school to post-school. Activities must be based on the student's strengths, preferences, and interests and include:

- instruction;
- related services;
- community experiences;
- the development of employment and other post-school adult living objectives; and
- when appropriate, acquisition of daily living skills and provision of a functional vocational evaluation.

Activities are not required for all areas but must be considered by the committee on special education (CSE) and documented in the student's IEP.

Pre-ETS and transition services that involve preparing students for competitive integrated employment provided by a participating agency may be included in the coordinated set of transition activities and can inform the present levels of performance and transition needs listed in the IEP.

The IEP must also include a statement of the responsibilities of the LEA and, when applicable, participating agencies, including those delivering Pre-ETS, for the provision of such services and activities that promote movement from school to post-school opportunities, or both, before the student leaves the school setting.

What are some examples of the delivery of Pre-ETS?

All Pre-ETS are based on a student's individualized needs and, for each of the five Pre-ETS services, could include:

Job Exploration Counseling

- Providing information regarding in-demand industry sectors and occupations (Labor Market).
- Providing information about non-traditional employment options, including military, entrepreneurship, and self-employment.
- Administering vocational interest inventories to assist with the identification of career pathways of interest.
- Exploring the connection between the student's abilities and the identified occupations and career pathways of interest.

Work-Based Learning Experiences

- Participation in a work-based learning internship provided over the summer, after school, or when the student is available.
- A job shadowing experience.
- Workplace tours or field trips.
- Informational interviews with professionals working in fields of interest to the student.

Counseling on Postsecondary Education Opportunities

- Researching and exploring information on course offerings, career options, types of academic, vocational, and occupational training needed to succeed in the workplace and the postsecondary opportunities associated with a career field or comprehensive transition pathway.
- Advising students and family members on academic curricula, college/vocational training applications and admissions processes, and completing the Free Application for Federal Student Aid.
- Connecting the student to the disability support services that would be available through other state agencies.
- Discussing the differences in accessing disability services between the special education and post-secondary education setting.

Workplace Readiness Training

- Workplace tours or field trips
- Increasing financial literacy skills
- Improving travel skills
- Improving or developing independent living skills
- A work-readiness skills club that meets during or after school.

Instruction in Self-Advocacy

- Disability understanding and disclosure
- Identifying independence and decision making (including supported decision making)
- Identifying, selecting, requesting and utilizing accommodations
- Knowledge of rights and responsibilities

How can Pre-ETS vendors participate in the development of the student's IEP?

When the purpose of the CSE meeting is to discuss transition services, including Pre-ETS, a representative of any participating agency likely to be responsible for providing or paying for transition services must be invited to the meeting to the extent appropriate. Consent from the student's parent (or from the student who is 18 years of age or older) must be obtained prior to inviting a participating agency to the meeting. Written consent is needed because personally confidential information about a student will be shared at the CSE meeting. If an agency invited to send a representative to a CSE meeting does not attend, the school district must take steps to involve the other agency in the planning of the student's transition services. [[Section 200.4\(d\)\(4\)\(i\)\(c\) of the Regulations of the Commissioner](#)]

As a representative of a participating VR agency, the contracted Pre-ETS vendor may be invited to the CSE meeting with consent.

How can LEAs arrange Pre-ETS?

LEAs who wish to arrange Pre-ETS for potentially eligible students should designate a staff member (e.g., transition coordinator, school counselor) to contact the Senior Vocational Rehabilitation Counselor TAYS in their ACCES-VR District Office. [Student and Youth Transition Services | Adult Career and Continuing Education Services | NYS Education Department](#)

Students who are already eligible for ACCES-VR services can access Pre-ETS through their assigned VRC.

Provision of Pre-ETS for students who are blind is coordinated through the New York State Office of Children and Family Services Commission for the Blind (NYSCB) by contacting:

Statewide Coordinator of Children and Transition Services
Associate Vocational Rehabilitation Counselor
NYSCB
52 Washington Street, South 201
Rensselaer, NY 12144
Phone: (518) 474-6956
Fax: (518) 486-5819
visionloss.ny.gov

How can I learn more about Pre-ETS and Transition Planning?

New York State Resources

To learn more about Pre-ETS in your region, reach out to the [Senior VRC TAYS at your ACCES-VR District Office](#).

For more information on Transition Planning, see NYSED's [Transition from School to Post School for Students with Disabilities website](#).

NYSED's [Office of Special Education Educational Partnership](#) is a coordinated network of support focused on enhancing services and supports for students with disabilities. Regional transition specialists provide resources and training on transition planning to build engagement in post-school opportunities.

Federal Resources

[Coordinating Transition Services and Postsecondary Access](#) (January 2025) describes how State educational agencies, local educational agencies, and State VR agencies may coordinate to assist students with disabilities who are in high school and will be transitioning out of high school and will potentially receive services as an adult.

Information regarding transition planning and Pre-ETS can be found in [Transition Guide to Postsecondary Education and Employment for Students and Youth with Disabilities \(August 2020\)](#).

[The National Technical Assistance Center on Transition: The Collaborative](#), provides many resources to support understanding and implementation of Pre-Employment Transition Services,

[A Side-by-Side View: Transition Services](#) is a chart comparing the transition services related to Pre-ETS, VR and IDEA.

[A Compendium to the Delivery of Pre-Employment Transition Services](#) highlights Pre-Employment Transition Services within the Continuum of VR Services.