

GAO

Report to the Ranking Member,
Committee on Education and the
Workforce, House of Representatives

July 2012

STUDENTS WITH DISABILITIES

Better Federal Coordination Could Lessen Challenges in the Transition from High School



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Highlights of [GAO-12-594](#), a report to the Ranking Member, Committee on Education and the Workforce, House of Representatives

Why GAO Did This Study

The transition out of high school to postsecondary education or the workforce can be a challenging time, especially for students with disabilities. Multiple federal agencies fund programs to support these students during their transition. In 2003, GAO reported that limited coordination among these programs can hinder a successful transition. GAO was asked to provide information on the (1) challenges students with disabilities may face accessing federally funded transition services; and (2) extent to which federal agencies coordinate their transition activities. GAO reviewed relevant federal laws, regulations, and agency documents from Education, HHS, Labor, and SSA, which administer the key programs that provide transition services. GAO also administered a data collection instrument to gather program information from these agencies. Finally, GAO interviewed various stakeholders, including state and local officials, service providers, parents, and students with disabilities, in five states selected based on the number of federal grants they received to fund transition services.

What GAO Recommends

To improve the provision of transition services for students with disabilities, GAO recommends that Education, HHS, Labor, and SSA develop an interagency transition strategy that addresses (1) operating toward common outcome goals for transitioning youth; (2) increasing awareness of available transition services; and (3) assessing the effectiveness of their coordination efforts. All four agencies agreed with the recommendation.

View [GAO-12-594](#). For more information, contact Reva E. Moran at (202) 512-7215 or morani@gao.gov.

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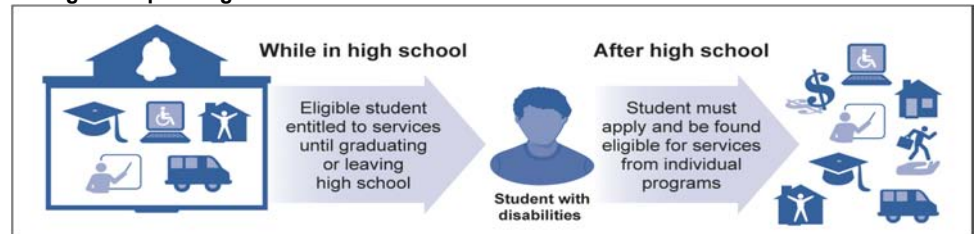
STUDENTS WITH DISABILITIES

Better Federal Coordination Could Lessen Challenges in the Transition from High School

What GAO Found

Students with disabilities face several longstanding challenges accessing services that may assist them as they transition from high school into postsecondary education or the workforce—services such as tutoring, vocational training, and assistive technology. Eligible students with disabilities are entitled to transition planning services during high school, but after leaving high school, to receive services that facilitate their transition they must apply as adults and establish eligibility for programs administered by multiple federal agencies. Students with disabilities may face delays in service and end up on waitlists if these programs are full. In addition, while all five states GAO contacted have taken steps to coordinate their transition services and assist families with the transition process, officials said that it is still difficult for students and their parents to navigate and for providers to coordinate services across different programs. Officials and parents GAO spoke with also noted a lack of sufficient information or awareness of the full range of service options available after high school on the part of students with disabilities, parents, and service providers. In addition, state and local officials said students with disabilities may not be adequately prepared to successfully transition to life after high school. This may be due, in part, to limited opportunities to engage in vocational and life skills training or obtain work experience while in school.

Students Move from Services Provided through Their High School to Services Delivered through Multiple Programs



Source: GAO analysis of agency documentation, including postings and publications.

The Departments of Education (Education), Health and Human Services (HHS), and Labor (Labor), and the Social Security Administration (SSA) coordinate transition activities to some degree, but their coordination has limitations and they do not assess the effectiveness of their efforts. One coordinating body involves all four agencies and focuses on transition services. However, that group's primary coordination activity is information sharing among staff-level representatives rather than developing common outcome goals and establishing compatible policies for operating across agencies. Agency officials told GAO that a lack of compatible outcome goals for transitioning students and differences in statutory eligibility criteria are among the barriers that hinder interagency coordination for this population. While agencies collaborate to some extent, their efforts represent a patchwork approach and there is no single, formal, government-wide strategy for coordinating transition services for students with disabilities. Moreover, it is unclear what impact coordination has on service provision because agencies do not assess the effectiveness of their coordination activities.

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Accountability * Integrity * Reliability

United States Government Accountability Office
Washington, DC 20548

July 12, 2012

The Honorable George Miller
Ranking Member
Committee on Education and the Workforce
House of Representatives

Dear Mr. Miller:

The transition from high school to postsecondary education or the workforce can be a challenging time for all students, and particularly for those with disabilities who may need additional services such as tutoring, vocational training, assistive technology, and other supports to achieve their goals. This can be a daunting process, and research has documented that students with disabilities are less likely than their peers to successfully make the transition. For example, as of February 2012, the employment rate for young adults ages 20 to 24 with disabilities was less than half the rate of their peers without disabilities. When young adults with disabilities do not successfully transition out of high school, they may face a lifetime of continued reliance on public assistance, potentially leading to substantial costs to the government and society. Although the total amount of federal money spent to support students with disabilities in transitioning out of high school is not known, the federal investment in educating students with disabilities is substantial. In 2011, the Department of Education (Education) awarded about \$11.5 billion in federal grants to states to help ensure that 6.6 million students with disabilities—approximately 2.2 million of whom were of transition-age¹—received a free appropriate public education, as required by the Individuals with Disabilities Education Act (IDEA), a key piece of legislation pertaining to transition. IDEA requires that beginning not later than the first individualized education program (IEP) to be in effect when the student turns 16, school officials must include in the IEP

¹ In this report, we use the term “transition-age” to refer to youth between the ages of 14 and 25. This age range covers youth served by the key programs we identified as providing transition services to youth with disabilities.

postsecondary goals and the transition services needed to assist the student in reaching those goals.²

Students remain eligible for transition planning and services, as well as other IDEA services, until they exit high school. Once students exit high school, they are no longer entitled to federal transition services under IDEA.³ Instead, they may apply and be found eligible for a number of other separately administered federal programs that are authorized to provide services that can assist youth with disabilities in their transition to postsecondary education, employment, and independent living. GAO has reported on the need for better coordination among federal disability programs, including those serving students with disabilities.⁴ This is one reason that, as of 2011, federal disability programs remained on GAO's high risk list.⁵ In light of questions about the accessibility and coordination of transition services for students with disabilities, you requested we provide information on: (1) challenges students with disabilities may face

² Pub. L. No. 108-446, 118 Stat. 2647, 2676, § 612(a)(1) (codified as amended at 20 U.S.C § 1412(a)(1)). 20 U.S.C. § 1414(d)(1)(A)(i)(VIII).

³ Students remain eligible for transition planning and services, as well as other IDEA services, until they graduate from high school with a regular high school diploma or exceed the earlier of age 21 or the eligibility age for a free appropriate public education under state law. While federal law authorizes students to receive a free appropriate public education up until age 22, eligibility for students aged 18-21 is determined by states. 20 U.S.C. § 1412(a)(1) and 34 C.F.R. § 300.102 (2011).

⁴ See GAO, *People with Disabilities: Federal Programs Could Work Together More Efficiently to Promote Employment*, [GAO/HEHS-96-126](#) (Washington, D.C.: Sept. 3, 1996); *Highlights of a Forum: Modernizing Federal Disability Policy*, [GAO-07-934SP](#) (Washington, D.C.: August 2007); *Special Education: Federal Actions Can Assist States in Improving Postsecondary Outcomes for Youth*, [GAO-03-773](#) (Washington, D.C.: July 31, 2003); *Summary of a GAO Conference: Helping California Youth with Disabilities Transition to Work or Postsecondary Education*, [GAO-06-759SP](#) (Washington, D.C.: June 20, 2006); *Federal Disability Programs: More Strategic Coordination Could Help Overcome Challenges to Needed Transformation*, [GAO-08-635](#) (Washington, D.C.: May 20, 2008); *Young Adults with Serious Mental Illness: Some States and Federal Agencies Are Taking Steps to Address Their Transition Challenges*, [GAO-08-678](#) (Washington, D.C.: June 23, 2008); and *High Risk Series: An Update*, [GAO-11-278](#) (Washington, D.C.: February 2011).

⁵ GAO publishes a high risk list to focus attention on government operations that it identifies as high risk due to their greater vulnerabilities to fraud, waste, abuse, and mismanagement or the need for transformation to address economy, efficiency, or effectiveness challenges. This list is updated biennially to remove areas where progress has been made and identify any new areas needing attention by Congress and the executive branch.

accessing transition services under existing federal programs; and (2) the extent to which federal agencies coordinate their transition activities.

To identify potential challenges, we reviewed the definitions of disability and the eligibility criteria in selected federal statutes governing federal programs that provide transition services.⁶ To assess the extent to which federal agencies coordinate their transition activities, we asked officials from the four agencies that administer key programs serving students in their transition out of high school—Education, the Departments of Health and Human Services (HHS) and Labor (Labor), and the Social Security Administration (SSA)—to provide information on their coordination efforts and activities relating to transition services. We compared their responses and agency documents to our criteria on activities that can enhance and sustain collaboration among federal agencies.⁷ In addition, we consulted a number of experts in the field of transition and from advocacy organizations that represent young adults with a wide range of disability types. Finally, to obtain the perspectives of state and local agencies that deliver transition services, we selected a nongeneralizable sample of five states and contacted officials to obtain their views. We selected these states based on the number of federal grants they received in fiscal year (FY) 2011 to fund transition services, recommendations of agency officials and experts, and geographic diversity.⁸ Through a combination of site visits and telephone interviews, we spoke with service providers and officials from state education, vocational rehabilitation, developmental

⁶ In this report, we use the term “transition services” to include educational services such as tutoring or study skills assistance, school-based work experience programs, assistive technology or accommodations; employment services such as vocational training, job search assistance, job coaching, or supported employment; or other support services such as independent living assistance and skill development, transportation, mentoring, benefits counseling, information, guidance and referral services, advocacy, or financial assistance for adaptive equipment or other assistive technology.

⁷ In this report we use the term “coordination” broadly to include interagency activities that others have variously defined as “collaboration,” “cooperation,” “integration,” or “networking.” Although there is no commonly accepted definition of coordination, we defined it as any joint activity by two or more organizations that is intended to produce more public value than could be produced when the organizations act alone. See E. Bardach, *Getting Agencies to Work Together: The Practice and Theory of Managerial Craftsmanship* (Washington, D.C.: Brookings Institution, 1998).

⁸ We visited the four states with a relatively large number of grants for programs that provide transition services (California, Florida, Maryland, and Minnesota) and interviewed officials by phone in the state with a relatively small number of grants for programs that provide transition services (Nevada).

disability, and workforce agencies. In each state we visited, we also met with groups of students with disabilities and parents to discuss the challenges they face. Appendix I explains our scope and methodology in more detail.

We conducted this performance audit from July 2011 through July 2012 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

To support the educational needs of children with disabilities, Congress originally enacted IDEA in 1975.⁹ Part B of IDEA authorizes federal funding for children aged 3 through 21 with a range of disabilities who need special education services. To receive federal funds, states and local education agencies must identify and evaluate children who have disabilities and provide special education and related services, as well as supplementary aids and services when necessary, to those who are eligible. Such services and supports are formulated in an IEP, which is developed, discussed, and documented by a student's IEP team.¹⁰ In the 2004 reauthorization of IDEA, Congress required that, beginning no later than age 16, a student's IEP must include measurable postsecondary goals related to training, education, employment, and where appropriate, independent living skills. The IEP also must specify the transition

⁹ IDEA was originally enacted as the Education for All Handicapped Children Act. Pub. L. No. 94-142, 89 Stat. 773 (codified as amended at 20 U.S.C. §§ 1400-1482) (1975).

¹⁰ 20 U.S.C. § 1414(d).

services¹¹ needed to assist the student in reaching those goals.¹² School officials are required to invite the student to a meeting where the transition services detailed in the IEP are discussed. When appropriate, they also must invite a representative of any participating outside agency (with the prior consent of the parent or student who has reached the age of majority).¹³

As students with disabilities exit high school, they may apply as adults and be found eligible for a number of federally funded programs, including federal disability programs, if they wish to obtain services important to their transition. There is wide diversity in this population—students with disabilities can have a range of physical and cognitive disabilities that can affect their ability to learn. They may also demonstrate varying levels of academic aptitude and achievement in different areas. Thus, the number of programs for which each student may be eligible can vary widely based on their abilities, postsecondary goals, and the types of supportive services they may need to be successful. We identified a range of programs that provide services to support students with disabilities in their

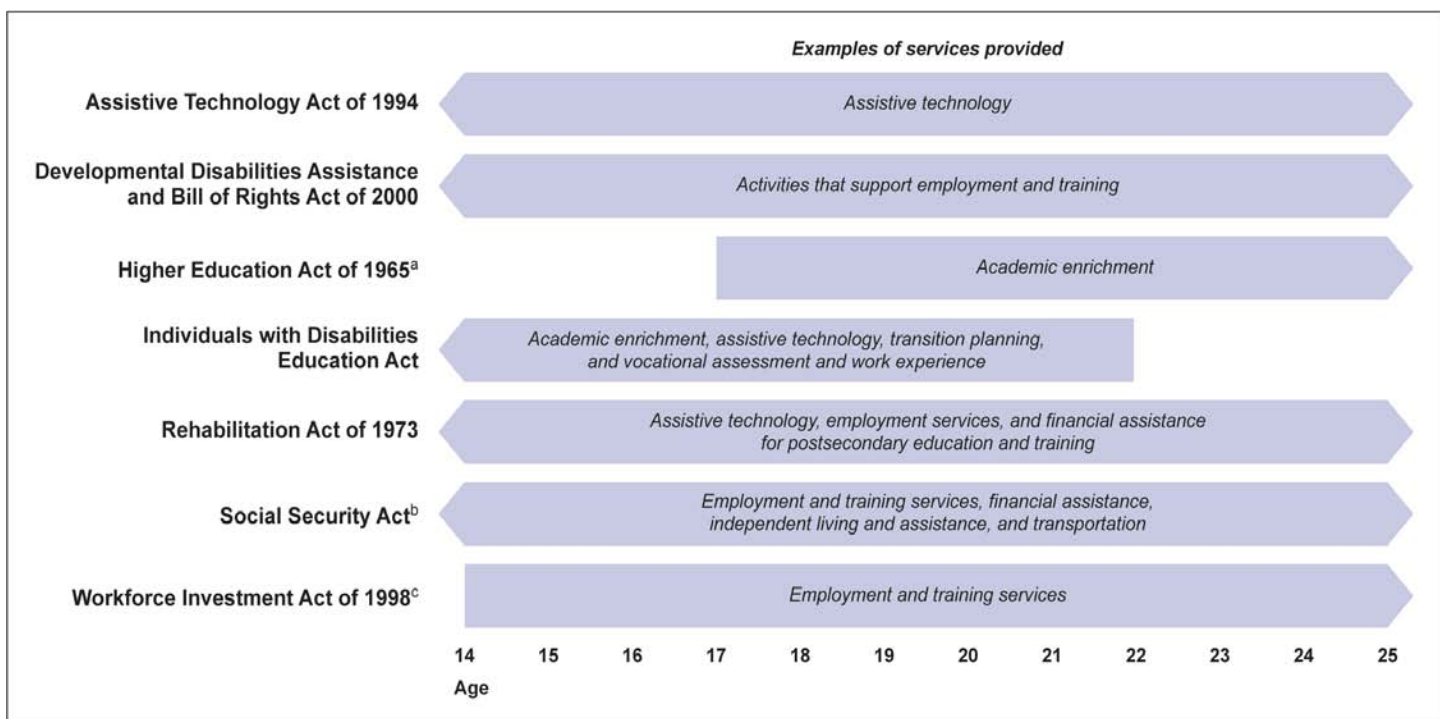
¹¹ Under IDEA, transition services are defined as a coordinated set of activities that (1) is designed to be within a results-oriented process focused on improving the academic and functional achievement of a child with a disability to facilitate the child's movement from school to post-school activities; (2) is based on the individual child's needs, strengths, preferences, and interests; and (3) includes 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 functional vocational evaluation. 20 U.S.C. § 1401(34).

¹² Individuals with Disabilities Education Improvement Act of 2004, Pub. L. No. 108-446, sec. 101, § 614(d)(1)(A)(i)(VIII), 118 Stat. 2647, 2709 (codified at 20 U.S.C. § 1414(d)(1)(A)(i)(VIII)).

¹³ 20 U.S.C. § 1414(d)(1)(B)(vii) and 34 C.F.R. § 300.321(b)(1) and (3) (2011). In addition to IDEA, other laws support the educational needs of students with disabilities. Section 504 of the Rehabilitation Act of 1973 prohibits entities that receive federal financial assistance, including public and private schools, from discriminating on the basis of disability against otherwise qualified individuals with disabilities. Pub. L. No. 93-112, § 504, 87 Stat. 355, 394 (codified as amended at 29 U.S.C. § 794). Regulations implementing Section 504 are at 34 C.F.R. pt 104 (2011). The Americans with Disabilities Act of 1990 prohibits discrimination on the basis of disability by public entities and public accommodations, including public and private schools, regardless of whether they receive federal financial assistance. Pub. L. No 101-336, §§ 201(1), 202, 301(7)(J) and 302, 104 Stat. 337, 354 and 355 (codified at 42 U.S.C. §§ 12131(1), 12132, 12181(7)(J) and 12182). Title II regulations are at 28 C.F.R. part 35 and Title III regulations at 28 C.F.R. pt 36 (2011). The requirements of Section 504 and Titles II and III of the Americans with Disabilities Act of 1990 and the rights of students with disabilities under them are not addressed in this study.

transition out of high school. These programs vary in the target population served, services provided, grant funding amounts, and other characteristics. In addition, they are authorized by multiple federal laws (administered through various federal agencies), each with its own eligibility requirements and application processes. (See fig. 1). Moreover, federally funded programs that provide transition services, as defined in this report, are often delivered through state and local entities that have flexibility on how to administer services.

Figure 1: Key Federal Legislation Providing for Services to Transition-Age Students with Disabilities



Source: GAO review of agency documentation, including postings and publications.

^aServices under the Higher Education Act of 1965, as amended by the Higher Education Opportunity Act, begin largely when a student enters postsecondary education. Pub.L. No. 110-315, sec. 709(2), §§ 766-769, 122 Stat. 3078,3365-67 (codified at 20 U.S.C. §§ 1140f-1140i)

^bStudents who meet certain criteria may receive SSI benefits prior to age 18; the Social Security Administration is statutorily required to redetermine the eligibility of all children receiving these benefits within one year of their 18th birthday. 42 U.S.C. § 1382c(a)(3)(H)(iii).

^cStudents who meet certain criteria may receive services through the Workforce Investment Act of 1998 (WIA) youth program between the ages of 14 and 21; services through the WIA adult program may begin at age 18. 29 U.S.C. § 2801(1) and (13).

The following four agencies have primary responsibility for administering federal programs that can provide services to transition-age youth with disabilities:

- Education’s Rehabilitation Services Administration awards funds to state vocational rehabilitation (VR) agencies in the form of matching grants to help individuals with disabilities prepare for and engage in gainful employment.¹⁴ VR programs require that an individualized plan for employment be developed for eligible students before they leave high school.¹⁵ Furthermore, if the student is receiving special education services, this plan must be coordinated with the student’s IEP in terms of goals, objectives, and services.
- Labor oversees the one-stop center system, a comprehensive workforce investment system created under the Workforce Investment Act of 1998 (WIA) that brings together multiple federally funded employment and training programs that can help all eligible individuals seeking employment and training—including students with disabilities.¹⁶ Labor also administers the Disability Employment Initiative, which is designed to improve educational, training, and employment opportunities and outcomes for youth and adults with disabilities who are unemployed, underemployed, and/or receiving Social Security disability benefits.
- SSA provides cash benefits to qualifying individuals with disabilities—including transition-age young adults—through its Disability Insurance

¹⁴ 29 U.S.C. §§ 702, 706 and 721(a)(2) and (3).

¹⁵ 29 U.S.C. § 721(a)(9) and 34 C.F.R. § 361.22(a)(2) (2011). If a state VR agency is operating under an order of selection, a plan must be developed for students who are eligible to receive services under the order of selection prior to when they leave school. A VR agency must implement an order of selection when it anticipates it will not have sufficient fiscal and/or personnel resources to fully serve all eligible individuals. 29 U.S.C. § 721(a)(5) and 34 C.F.R. § 361.36 (2011). An order of selection consists of priority categories to which eligible individuals are assigned based on the significance of their disability—individuals with the most significant disabilities are selected first for the provision of vocational rehabilitation services.

¹⁶ 29 U.S.C. § 2841.

and Supplemental Security Income (SSI) programs.¹⁷ SSA also administers the Ticket to Work program, which is designed to enable individuals with disabilities (who are receiving disability insurance or SSI benefits and are between the ages of 18 and 64) to obtain services needed to find, enter, and retain employment. They obtain these services from providers such as VR agencies.¹⁸

- HHS's Centers for Medicare & Medicaid Services manages Medicaid, the joint federal-state health care financing program for qualifying low-income individuals. Within the Medicaid program, states provide home and community-based services to individuals with certain types of disabilities—which may include young adults—who might otherwise be cared for in institutional settings.¹⁹ Because Medicaid usually does not cover home and community-based services, states must obtain a waiver to provide these services. Services provided in accordance with these waivers vary by state, are individualized, and may include, for example, case management, personal care attendants, or day or residential habilitation.²⁰

In addition, these and other federal agencies fund a number of other programs through grants to states, localities, and nongovernmental organizations that may assist students and young adults during their transition from high school. Some of these grants explicitly target

¹⁷ Individuals known as “disabled adult children” can receive Disability Insurance benefits if they are age 18 or older, were disabled before age 22, and have at least one parent who also receives Social Security payments because of retirement or disability or who is deceased but worked long enough to be eligible to receive benefits. 20 C.F.R. § 404.350(a) (2011). The SSI program provides financial assistance to eligible individuals who are age 65 or older, blind, or disabled, and who have limited income and resources. 42 U.S.C. § 1381a. Children under age 18 may qualify for SSI benefits if they meet SSA’s disability definition and financial eligibility requirements. 20 C.F.R. § 416.906 (2011). SSA is statutorily required to redetermine the eligibility of all children receiving these benefits within one year of their 18th birthday. 42 U.S.C. § 1382c(a)(3)(H)(iii).

¹⁸ 42 U.S.C. § 1320b-19.

¹⁹ 42 U.S.C. § 1396n(c).

²⁰ “Habilitation services” are defined as “services designed to assist participants in acquiring, retaining, and improving the self-help, socialization, and adaptive skills necessary to reside successfully in home and community-based settings.” 42 U.S.C. § 1396n(c)(5). Habilitation services are flexible in nature, they can be day or residential, and they can be specifically designed to fund services and supports that help an individual obtain or maintain employment.

improving postsecondary outcomes for students with disabilities and others provide a range of support services such as assistive technology, information and referral, advocacy, transportation, leadership development, benefits counseling, and independent living services. (See app. II for more information on federal programs that received federal funding in FY 2011 to provide transition services to students with disabilities.)

Students with Disabilities Face Several Longstanding Challenges Accessing Federal Transition Services

Students with disabilities face several challenges accessing federally funded programs that can provide transition services as they leave high school for postsecondary education or the workforce. These include difficulty navigating multiple programs that are not always coordinated; possible delays in service as they wait to be served by adult programs; limited access to transition services; a lack of adequate information or awareness on the part of parents, students, and service providers of available programs that may provide transition services after high school; and a lack of preparedness for postsecondary education or employment. Prior GAO work identified many of these same challenges, which is indicative of the longstanding and persistent nature of the challenges facing students with disabilities as they transition out of high school.²¹

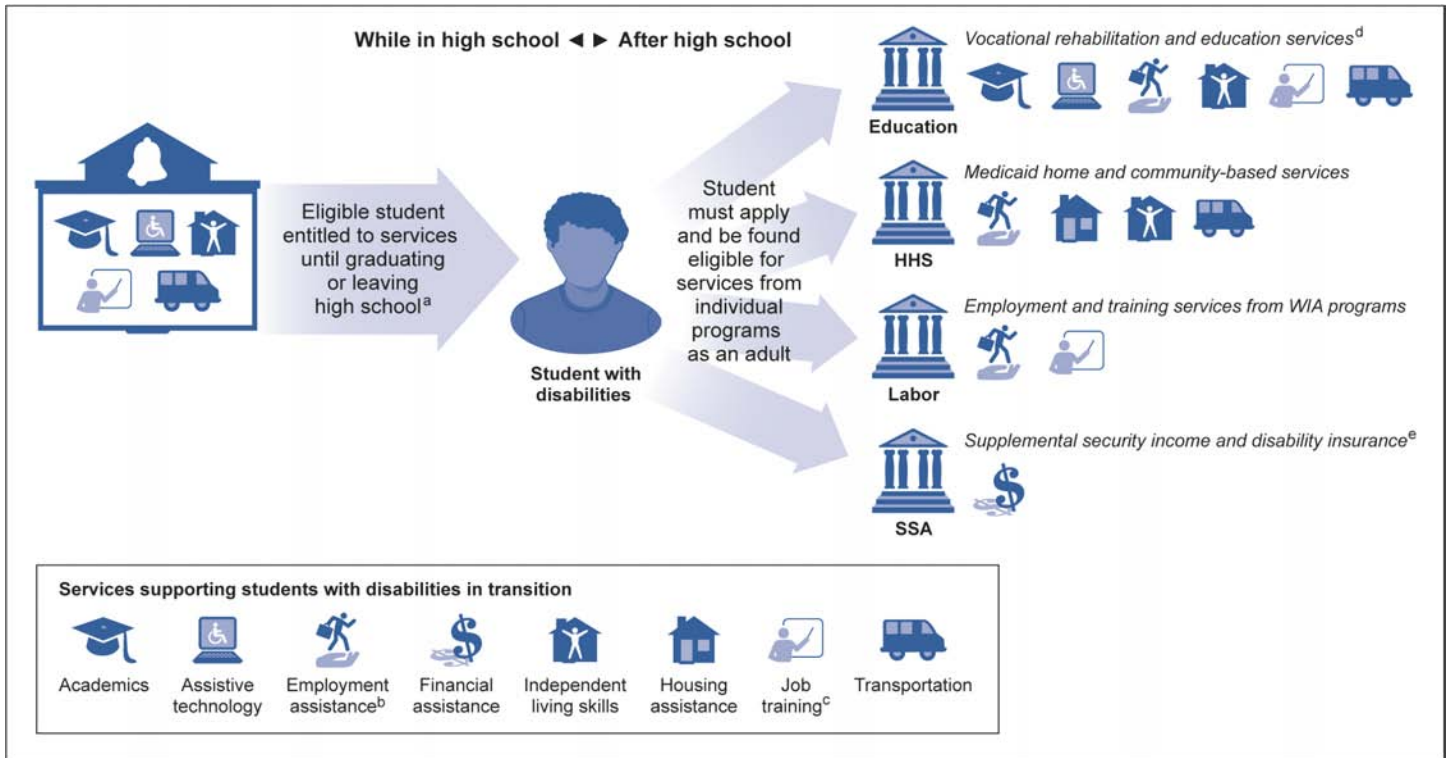
Difficulty Navigating Multiple Programs that Provide Transition Services

In each of the five states we contacted, state officials said it can be difficult for students with disabilities and their families to navigate the multiple federal programs that provide transition services.²² Some officials said that the shift from being automatically entitled to services under IDEA if identified as disabled while in high school to having to apply as adults and be found eligible for multiple programs after exiting high school is difficult for students and their parents to understand. (See fig. 2).

²¹ [GAO-08-678](#); [GAO-06-759SP](#); and [GAO-03-773](#).

²² In this section, we quantified the challenges identified during our interviews as follows: we used “most” if a challenge was mentioned in more than 85 percent of our interviews; “many” or “frequently” if a challenge was mentioned in over half; “some” if a challenge was mentioned in less than half; and “a few” if a challenge was mentioned in less than 25 percent of the interviews.

Figure 2: Students Move from Services Provided through Their High Schools to Services Delivered through Multiple Programs



Source: GAO analysis of agency documentation, including postings and publications.

Note: Students may also receive services from other federal and nongovernmental programs.

^aStates must identify, evaluate, and provide services to children with disabilities. Students with disabilities remain entitled to services until they graduate from high school with a regular high school diploma or exceed the earlier of age 21 or the eligibility age for a free appropriate public education under state law. While federal law authorizes students to receive a free appropriate public education up until age 22, eligibility for students aged 18-21 is determined by states. 20 U.S.C. § 1412(a)(1) and 34 C.F.R. § 300.102 (2011).

^bIncludes job coaching, job placement, and supported employment.

^cIncludes vocational assessment, vocational education, and work-based experiences.

^dStudents must disclose their disability to obtain services in college.

^eSSA is statutorily required to redetermine the eligibility of all children receiving SSI benefits within one year of their 18th birthday. 42 U.S.C. § 1382(a)(3)(H)(iii).

Many of the stakeholders told us that a lack of coordination between programs was another key challenge for students with disabilities and/or

State efforts to coordinate services across programs:

- Florida's "Project 10 Transition Education Network" helps school districts provide appropriate planning and timely transition services to assist students with disabilities in their transition to adulthood and to improve their academic success and post-school outcomes. One of the network's current focuses is on interagency collaboration, with the goal of improving collaboration between school districts and community agencies that provide transition services to young adults with disabilities.
- Ten school districts in Maryland participate in the state's ongoing Seamless Transition Collaborative, which involves several state agencies and focuses specifically on the braiding of funds to provide seamless transitions from high school to employment and/or college. The braiding of funds involves bringing together multiple but separate funding streams to pay for more than any one stream can support, and then carefully pulling them back apart to report to funders on how the money was spent.
- Minnesota's Department of Employment and Economic Development has placed VR counselors in some high schools and hosts an annual meeting with representatives from high schools to discuss VR's expectations for how it will be involved in transition planning and services for high school students.
- A school district in California allows its high schools to contract with VR and SSA for transition-related services and has two VR counselors located in the schools. The district also participates in SSA's Ticket to Work program and is part of a state-wide initiative linking students with disabilities to work opportunities.

their families.²³ For example, staff from a parent training and information Center in Minnesota said that it is very challenging for parents to navigate the system and coordinate resources for their children across programs. In their experience, none of the program officials coordinate with those from other programs to share information on clients. State officials suggested that a lack of coordination between programs often arises as early as during IEP transition planning meetings. IDEA requires high schools to invite, with parental or student consent, representatives from adult programs likely to be responsible for providing or paying for transition services to the student after high school, such as VR, to these meetings to the extent appropriate.²⁴ These representatives, however, are not required to attend, and we heard that they are often not at the table for transition planning meetings. VR officials from one state acknowledged this, saying that while they try to attend transition planning meetings, it is not always possible because of resource and time constraints. Some of the stakeholders suggested that without the commitment of local leaders and service providers to coordinate services between high school and adult programs, there is little to no communication between programs, which can create difficulty for families trying to navigate across different programs.

In each of the five states we contacted, some officials said that differing requirements for adult programs can confuse students and parents. For example, officials from Florida's department of VR said that the requirement for VR clients to have an individualized plan for employment that identifies an employment goal and the services and supports necessary to achieve that goal can be confusing for youth who already included transition plans and identified a career goal in their IEP. In addition, the amount of documentation each program requires can be overwhelming for students with disabilities and their parents. According to a student in Maryland, there is a continuous administrative burden on applicants to provide the same or similar information to multiple programs. Officials we interviewed from three of the four federal agencies acknowledged these challenges.

²³ The term "stakeholders" refers to federal, state, and local officials; students and parents; and experts on transition.

²⁴ 34 C.F.R. § 300.321(b)(3) (2011).

In each of the states we contacted, officials suggested that it would be helpful to appoint a case manager to coordinate services and guide students and their families through the transition process. Some of the parents and also officials from two of the four federal agencies agreed that a case manager could help students with disabilities and their families navigate across the multiple programs. However, officials from one federal agency cautioned that it could be costly and, given that programs that provide transition services are administered by different federal agencies and implemented at the state and local level, challenging to administer.

Delays in Service

Students with disabilities may also face delays in service upon leaving high school as they wait to obtain services from adult programs or for their eligibility determinations to be finalized. Many stakeholders said that delays in service can be caused by limited financial or program resources, which may leave youth with disabilities on waitlists for services. In particular, states may have waitlists—sometimes with several thousand individuals—for home and community-based waiver services. The departments of VR in four of the five states we contacted were operating under a federally required order of selection, requiring them to serve individuals with the most significant disabilities before serving others.²⁵ Several parents from Minnesota said that their children had been on waitlists for waiver services or VR services for years. One parent from Florida said that her adult son was living at home with no services or employment options as he waited for waiver services from the state's department of disability. Officials from Nevada's department of VR said that delays in service may also occur when students with disabilities, upon leaving high school, must return assistive technology devices on loan from the school, such as software for blind individuals that reads text on a screen in a computer-generated voice. According to officials, some students go without these critical adaptive devices until VR is able to equip them with the same or similar technologies.

Service delays can be exacerbated if students with disabilities have to wait until program officials resolve who should provide and pay for services. In addition, some adult programs will not provide services to

²⁵ 29 U.S.C. § 721(a)(5) and 34 C.F.R. 361.36. According to Education officials, 45 VR agencies have implemented an order of selection, as required by federal law, because they are unable to service all eligible individuals in the state due to their lack of financial or staff resources.

students who are still eligible to receive services under IDEA.²⁶ Officials from two states said that, as a result, there has been a shift toward keeping students with disabilities in high school longer so that schools continue paying for services until students graduate or turn 22 years of age. For example, officials from Maryland’s department of VR said that students with developmental disabilities who decide to leave high school before they age out of IDEA services often face a delay in services because the state department of developmental disability will not provide services to students younger than age 21.²⁷

Aligning eligibility criteria and definitions of disability:

In Nevada, the state Department of Special Education is working with the state higher education system to align their definition of disability, eligibility criteria, and documentation requirements to make the transition from high school to college easier and more seamless for students.

Some of the stakeholders said that differing eligibility criteria, definitions of disability, and assessment requirements for the various adult programs can also result in service delays while youth with disabilities wait for assessments or eligibility determinations. For example, officials in the four states in which we spoke with higher education officials said some colleges require students with disabilities to be reassessed before they can receive accommodations, and that this can cause a delay in service because there are long waitlists for these reassessments or because they are cost prohibitive for some families.

Limited Access to Transition Services

Limited access to reliable public transportation to and from employment programs and service providers—especially in rural areas—was also frequently highlighted as a major challenge. For example, officials from Florida said limited funding for transportation services contributes to the lack of transportation for students with disabilities.

Officials in each of the states we contacted also said that certain groups of students with disabilities are more likely to face limited service options or gaps in service because their disabilities may be less visible or

²⁶ Young adults with disabilities may not be eligible for some adult services until they graduate from high school with a regular diploma or exceed the age eligibility for a free appropriate public education under state law because of “payer of last resort” provisions, which specify the order in which funding sources or programs should pay for services. For example, both VR and Medicaid function as payers of last resort—if another program or funding source (for example IDEA) is still available to that individual, that other source must be exhausted before VR and Medicaid will pay for services. 29 U.S.C. § 707 (regarding nonduplication), and 42 U.S.C. § 1396a(a)(25) and 42 C.F.R. § 433.139(b) (regarding third-party liability) (2011).

²⁷ According to HHS officials, Maryland has waivers, Community Pathways and New Directions Independence Plus, that can serve individuals with developmental disabilities who are under the age of 21.

because they are less likely to qualify for adult programs. These groups include students with developmental or cognitive disabilities, learning disabilities, mental health disabilities, autism, and mild disabilities. Further, we heard that there may be limited programs for students with hearing or visual impairments, and that if these students also have other disabilities, it can be difficult to determine which program (e.g., VR or a developmental disability agency) should provide services, which can lead to gaps in service. Similarly, officials said that students with disabilities who are in the juvenile justice system, are themselves parents, or are homeless may also be more likely to face gaps in service than other students with disabilities because they tend not to be aware of or connected to adult service providers. In addition, some students who qualified for services under IDEA and/or under Section 504 of the Rehabilitation Act may not meet the eligibility requirements for adult programs and may, therefore, have limited or no post-high school service options. For example, one parent told us that her daughter, who has a serious physical disability, did not receive any transition planning assistance and struggled to gain access to services such as personal care attendants who would help her successfully transition to a college out of state.

Lack of Adequate Information and Awareness of Options after High School

A lack of adequate information and awareness of available program options on the part of parents, students, and service providers was another challenge highlighted during our site visits. Many stakeholders said that students with disabilities and their parents do not always receive enough information about the full range of service options after high school. For example, a parent from California said that she was very disappointed with the limited information she received from her school district and that she had no idea what resources were available for her son after he left high school. A student from Maryland expressed concern that students with disabilities who do not seek information about transition services outside of high school may not have access to information, and consequently, to needed services. In contrast, a few stakeholders said parents may receive too much information and feel overwhelmed. For example, a parent from California said that families may receive so much information that they do not remember everything and do not know where to seek help when the time comes. A staff member from the California Department of Education's Workability program said that, even when information about transition services is available, it is generally not

compiled and made available in one central place for families to access.²⁸ She recommended that states or programs develop an accessible, easy to read transition manual that clearly lays out post-high school service options.

Centralized information about transition service options:

- Maryland's Department of Education, developed a "Transition Planning Guide", designed to provide students with disabilities and their families with easily understandable and accessible information about transition services and options.
- One of the parent training and information centers in Minnesota developed an online resource mapping tool to help families identify services within their community that their children might be eligible for based on where they live.

Sometimes there was an issue with the accuracy of information parents received. For example, officials in three of the five states we contacted said that parents may be misinformed about programs, especially about the ability of their children to retain SSI benefits. Officials from Florida's developmental disability agency noted that parents are often misinformed by teachers or adult program service providers that their children will lose these benefits entirely if they obtain any paid employment.

Lack of awareness of service options also extended to teachers and other high school personnel. Many of the stakeholders said that teachers and other high school personnel may not always be aware of post-high school service options for students with disabilities. For example, one parent said that while there are a lot of programs in her community that can aid students in transition, school personnel are not aware of them and therefore cannot appropriately guide students with disabilities and their families. Moreover, some experts and state education officials said that teacher training and professional development programs do not always adequately prepare teachers to provide transition services or inform them about the various agencies and resources available to students with disabilities. A few of the officials, however, said that teachers in some school districts are well trained in and aware of adult programs that can provide transition services, which allows them to disseminate information to students and their parents.

In addition, some stakeholders said that service providers from adult programs may not be used to working with this student population or have limited awareness of other adult programs that can provide complementary transition services. For example, stakeholders in Maryland and Nevada said that VR counselors need additional training to work with transition-age youth with disabilities and officials from Maryland's local workforce agencies said that one-stop center staff need more training to help these students enter the workforce. A representative

²⁸ California's Workability program is a school-based work program for students with disabilities, designed to offer the opportunity to complete high school while obtaining marketable job skills.

Inadequate Preparation for Postsecondary Education or the Workforce

from a parent training and information center in Maryland added that the knowledge service providers have about other programs is piecemeal and inconsistent. She suggested the federal government support additional training for all professionals who work with students in transition.

Many stakeholders said that high schools do not always adequately prepare students with disabilities for college or the workforce, and cited several contributing factors. According to some officials, the federal requirement to begin transition planning by age 16 is too late. In fact, officials in four of the five states we contacted said that schools are required to start transition planning at an earlier age.²⁹ In addition, in all five states we heard that schools' emphasis on academic achievement has left little time for vocational and life skills training, even though these skills may be key to gaining and retaining employment—especially for students with disabilities. Officials from Minnesota's department of VR said that schools need to pay greater attention to vocational training because students with disabilities are at a distinct disadvantage if they leave high school with no work experience. Further, officials from Maryland's department of developmental disabilities said that because most jobs require a high school diploma, students with disabilities who receive certificates instead of diplomas could find their employment options significantly curtailed because many employers do not recognize alternative completion documents.³⁰ As a transition specialist from Maryland noted, many students with non-traditional diplomas end up in

²⁹ Since the 2004 reauthorization of IDEA, schools have been required, beginning no later than the first IEP that will be in effect when a student turns 16 years of age, to include in the IEP postsecondary goals and the transition services needed to assist the student in reaching those goals. Individuals with Disabilities Education Improvement Act of 2004, Pub. L. No. 108-446, sec. 101, § 414(d)(1)(A)(i)(VIII), 118 Stat. 2647, 2709 (codified at 20 U.S.C. § 1414(d)(1)(A)(i)(VIII)). Furthermore, we were told by state officials that some states require that transition planning begin earlier than age 16, including four of the five states we contacted, which required transition planning to begin at age 14.

³⁰ In some states, some students with disabilities receive a certificate of completion or other alternatives to a high school diploma.

sheltered workshops because they are not considered to be qualified for competitive employment opportunities.³¹

State efforts to address lack of preparedness:

- Florida's High School High Tech program, a community-based partnership made up of students, families, businesses, educators, and rehabilitation professionals, and jointly funded through a non-profit organization and the state Department of Education, Division of Vocational Rehabilitation, is designed to provide students with all types of disabilities with the opportunity to explore jobs or college experiences that could lead to careers in technology.
- California's Workability program is a school-based work program for students with disabilities, and coordinates services among the state Departments of Employment Development, Education, and Rehabilitation. This program offers special education students the opportunity to complete high school while obtaining marketable job skills. It is designed to provide comprehensive pre-employment training, employment placement, and follow-up for high school students in special education who are making the transition from school to work, independent living, and college or training.

In addition, according to some stakeholders, adult programs are not always designed to meet the needs of transition-age youth with disabilities in ways that will help them succeed in college or in a job. For example, a few state officials said that the VR system does not provide incentives for serving transition-age youth with disabilities because VR's performance indicators reward counselors for serving clients who find and maintain employment for at least 90 days, and youth with disabilities may take longer to do so.³² Similarly, we heard from a few officials, including representatives from California's workforce agency, that the time frame of the employment outcome measures under the WIA youth program may be too short—for example, the employment retention rate at 6 months³³—and not appropriate for transition-age youth with disabilities who often require follow-up support longer than 6 months in order to be successful at a job.³⁴

Another frequently mentioned challenge was low expectations by parents, service providers, and even students themselves about what students with disabilities can achieve. These groups told us that low expectations often contributed to students with disabilities being unprepared for college or the workforce because parents, teachers, and others may not have exposed them to all available options for life after high school. Consequently, some officials said students may be directed to apply for

³¹ To prevent curtailment of employment opportunities for individuals with disabilities, Labor is authorized under certain conditions to issue certificates permitting employers to pay them less than the otherwise required minimum wage. 29 U.S.C. § 214(c). Sheltered workshops, which are also referred to as work centers, exclusively or primarily employ people with disabilities certified to be paid less than the otherwise required minimum wage.

³² We previously reported that Education does not comprehensively measure the performance of VR for certain key populations, including transition-age youth. See GAO, *Vocational Rehabilitation: Better Measures and Monitoring Could Improve the Performance of the VR Program*, [GAO-05-865](#) (Washington, D.C.: Sept. 23, 2005).

³³ 29 U.S.C. § 2871(b)(2)(A)(i)(II).

³⁴ We previously reported that WIA performance measures can create disincentives for one-stop centers to serve clients with disabilities. See GAO, *Workforce Investment Act: Labor Has Taken Several Actions to Facilitate Access to One-Stops for Persons with Disabilities, but These Efforts May Not Be Sufficient*, [GAO-05-54](#) (Washington, D.C.: Dec. 14, 2004).

social security benefits instead of receiving job training, and that students with more serious disabilities who could benefit from competitive employment (i.e., applying for and getting a job) may be steered instead toward adult day training programs and sheltered workshops.

Federal Agency Coordination of Transition Activities Has Limitations

Federal Agencies Coordinate on Specific Transition Activities but Face Some Barriers

Education, HHS, Labor, and SSA coordinate transition activities to some degree, but their coordination has limitations and they do not assess the effectiveness of their efforts. They coordinate on some specific transition activities, but their efforts are primarily focused on information sharing and lack elements that our prior work identified as enhancing and sustaining effective coordination.³⁵ We have reported on the importance of developing common outcome goals and of engaging in strategic planning and coordination to address issues that cut across agency boundaries. This can take many forms, ranging from occasional meetings between agency staff to more structured joint policy teams operating over a long period of time.³⁶

One federal coordination effort—the Federal Partners in Transition Workgroup—targets transition services to students with disabilities and involves all four agencies that administer the key programs that provide transition services to youth with disabilities.³⁷ However, this workgroup is informal and primarily involves information sharing among staff-level representatives, according to agency officials. For example, SSA officials

³⁵ While some coordination efforts included in this report involve other federal agencies, we focused on Education, HHS, Labor, and SSA because these four agencies administer the key programs serving students in their transition out of high school.

³⁶ [GAO-06-15](#).

³⁷ The Federal Partners in Transition Workgroup focuses on all youth, including students, with disabilities. In this report, we refer to the group's efforts related to students with disabilities, as appropriate, to be consistent with the focus of our review.

told us that in past meetings, their staff presented information about SSI requirements for the transitioning youth population, including the process for redetermining eligibility for SSI when youth turn age 18, and information on the Student Earned Income Exclusion.³⁸ To a lesser extent, some workgroup members also reported that they have jointly developed guidance for students with disabilities and grantees, including a fact sheet about how students can take advantage of Schedule A hiring authority for federal jobs.³⁹ In addition, the workgroup has convened forums to help students with disabilities develop their leadership and self-advocacy skills and to discuss action steps to ensure students are prepared to move successfully to adulthood. This workgroup also convened a meeting of representatives of technical assistance centers to discuss coordination among the centers. Agencies involved in the workgroup reported varying levels of involvement in more extensive coordination activities, such as policymaking, program planning, and joint strategic planning. Labor officials leading the effort told us they are in the process of drafting a strategic plan to identify objectives, activities, and outcomes for the group.

Education and Labor also participate in the National Community of Practice in Support of Transition, which was developed by the IDEA Partnership and focuses on joint efforts among state and local agencies to coordinate and improve outcomes for youth with disabilities in transition. Both agencies also have established intra-agency groups to facilitate collaboration between internal program offices.⁴⁰ (See fig. 3.)

³⁸ The Student Earned Income Exclusion allows SSA to exclude a certain amount of a beneficiary's earned income when determining benefits payments. 42 U.S.C. § 1382a(b)(1). This exclusion is one of the incentives SSA offers to encourage work among SSI recipients. In addition, the Social Security Disability Amendments of 1980 allowed for continued payments under VR or a similar program to eligible beneficiaries until the completion of the program, beneficiary participation ends, or continued participation will not increase the likelihood of exit from the disability benefit rolls. Pub. L. No. 96-265, § 301, 94 Stat. 449-50 (codified as amended at 42 U.S.C. §§ 425(b) and 1383(b)(6)). Examples of specific programs that trigger this provision include Ticket to Work, VR, and special education services under IDEA for individuals ages 18 through 21.

³⁹ Schedule A hiring authority allows individuals with disabilities to apply for a federal appointment through a noncompetitive hiring process. 5 C.F.R. § 213.3102(u). (2012).

⁴⁰ The IDEA Partnership is funded by the Office of Special Education Programs through the Technical Assistance and Dissemination to Improve Services and Results for Children with Disabilities program. 20 U.S.C. § 1463. The partnership brings together representatives from national associations, service providers, and agencies that have a vested interest in improving results for all students, including those with disabilities.

Education officials also said they recently sponsored a national transition conference for more than 800 professionals, families, and students to facilitate collaboration and communication across federal, state, and local entities. Aside from these efforts, officials said most of their interagency coordination regarding transition services occurs on an ad hoc basis, such as sharing white papers and holding informal discussions about policies, performance measures, and technical assistance to states. In addition, several federal coordination efforts broadly target disadvantaged youth or all individuals with disabilities and may address some aspects of transition. (See app. III).

Figure 3: Federal Coordination Efforts Specific to Transition Services

Name and purpose of effort	Education	HHS	Labor	SSA	Key activities coordinated	Mechanisms of coordination
Federal Partners in Transition Workgroup Promote youth service delivery systems to assist youth with disabilities transition to postsecondary education or employment	●	●	★	●	Policymaking, guidance to federal grantees, program planning, and information exchange through databases and websites	Interagency meetings, regular information sharing
IDEA Partnership National Community of Practice in Support of Transition Improve interagency transition initiatives and promote the role of youth in the transition process through providing technical assistance to service providers, youth, and families	★		●		Standards and practices, guidance to grantees and beneficiaries, program planning, information exchange through databases and websites	Interagency meetings, regular information sharing, cross-training of staff, joint training of grantees, joint information sessions for beneficiaries
Office of Special Education and Rehabilitative Services Transition Steering Committee Facilitate collaboration between offices within the Office of Special Education and Rehabilitative Services, federal partners, and other stakeholders to improve outcomes for transitioning youth with disabilities	☆				Guidance to grantees and beneficiaries, program planning, information exchange through databases and websites	Common policies, intra-agency meetings, joint strategic planning, regular information sharing, intra-agency or shared databases, co-location and cross-training of staff, joint training of grantees, joint information sessions for beneficiaries, joint evaluations and reports
Youth with Disabilities Work Group Assist public workforce development systems to expand capacity to serve youth with disabilities and develop guidance to increase the percentage of youth with disabilities who receive diplomas and certificates, and achieve other education and employment objectives			☆		Guidance to grantees and beneficiaries, program planning	Intra-agency meetings, regular information sharing, joint training of grantees, joint information sessions for beneficiaries

- ★ Agency leads effort
- ☆ Intra-agency effort
- Agency is involved in the effort

Source: GAO analysis of information provided by agency officials.

Note: While some coordination efforts included in this figure involve other federal agencies, we focused on Education, HHS, Labor, and SSA because they administer the key programs serving students in their transition out of high school. Key activities coordinated and mechanisms of coordination were reported by at least half of the reporting member agencies. For efforts with two key member agencies, only mechanisms and activities reported by both agencies were included.

Some federal agencies are involved in new demonstration projects that plan to address coordination across systems at the state and local level. For example, an official from HHS stated that the agency has coordinated with Education and Labor to develop grants under the new Projects of National Significance Partnerships in Employment Systems Change. This initiative will provide resources for state agencies and service providers to collaborate with other services systems to develop statewide model demonstration projects that expand competitive employment for youth with developmental disabilities. In another example, officials at all four

agencies said they have been involved in early discussions regarding implementation of the new Promoting Readiness of Minors in Supplemental Security Income (PROMISE) initiative, which will fund pilot projects in states to promote positive changes in the outcomes of youth SSI recipients and their families.⁴¹ Education officials said they are in the process of holding meetings to gather input on potential projects from federal partners and stakeholders, including state agency officials, service providers, researchers, policy experts, and families. As part of the initiative, Education and SSA officials said they will work collaboratively to identify legislative barriers to competitive employment and ways to improve coordination at the state level. In addition to collaborative efforts across agencies, Education officials said that six grants focusing on transition and funded by their Rehabilitation Services Administration are in their fifth and final year of operation. According to Education officials, these grants demonstrate the use of promising practices of collaborative transition planning and service delivery to improve the postsecondary education and employment outcomes of youth with disabilities.

Despite these efforts, federal agency officials identified several barriers that limit their ability to coordinate. We have reported that federal agencies face a range of coordination barriers, one of which stems from goals that are not mutually reinforcing or are potentially conflicting, making it difficult to reach a consensus on strategies and priorities.⁴² We found interagency coordination is enhanced by having a clear and compelling rationale for staff to work across agency lines and articulate the common federal outcomes they are seeking.⁴³ Indeed, officials identified a lack of compatible outcome goals for transitioning students with disabilities as one of the key barriers that hinder their coordination efforts.

The incompatibility in outcome goals is highlighted in the implementation of specific programs, according to agency officials. For example, goals for employment outcomes in VR and workforce programs are in some cases

⁴¹ PROMISE, which was first funded in FY 2012, is a joint initiative of Education, HHS, Labor, and SSA. Education officials said they are currently in the planning stage of the initiative.

⁴² Mutually reinforcing goals or strategies are designed to help align agency activities, core processes, and resources to achieve common outcomes.

⁴³ [GAO-06-15](#).

countered by requirements for students to prove that their disabilities limit their ability to work in order to receive SSI benefits.⁴⁴ Similarly, officials told us that, in early interagency discussions regarding the PROMISE initiative, special education officials focused on students' access to postsecondary education, while VR and SSA officials were more concerned about students' earnings. Officials from all four agencies said that aligning outcome goals for transition-age students with disabilities would enhance interagency coordination and help agencies approach transition in a more integrated way. Some officials suggested establishing a common agreement on desired outcomes for transitioning students, such as economic self-sufficiency or engagement in meaningful employment, volunteer work, or postsecondary education by a certain age.

Differences in statutory eligibility criteria among programs also limit federal agencies' ability to coordinate, according to agency officials. For example, one official said that special education and SSI programs, in effect, have different legal definitions of "child"⁴⁵ and "transition services,"⁴⁶ making it more difficult to identify potential service recipients across programs and to share data about individuals served by multiple

⁴⁴ 42 U.S.C. § 1382c(a)(3) (defining "disabled" in part as "unable to engage in any substantial gainful activity by reason of any medically determinable physical impairment). HHS officials said parents' fear of losing health insurance benefits for their children with disabilities creates a similar disincentive for these youth to pursue competitive employment. However, officials said new provisions under the Patient Protection and Affordable Care Act that allow individuals to remain on their parents' insurance policies until age 26 could help mitigate this. Pub. L. No. 111-148, sec. 1001, § 2714, 124 Stat. 119,132 (codified at 42 U.S.C. § 300gg-14).

⁴⁵ The age range for children served through special education under IDEA is 3 through 21. 20 U.S.C. § 1412(a)(1)(B). SSI serves children from birth to age 18, (42 U.S.C. § 1382c(c)), at which point there must be a redetermination as to whether or not they are still eligible for SSI benefits as adults (42 U.S.C. § 1382c(a)(3)(H)(iii)).

⁴⁶ Under IDEA, transition services are provided through special education and make up a coordinated set of activities that (1) is designed to be within a results-oriented process focused on improving the academic and functional achievement of a child with a disability to facilitate the child's movement from school to post-school activities; (2) is based on the individual child's needs, strengths, preferences, and interests; and (3) includes 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 functional vocational evaluation. 20 U.S.C. § 1401(34). The definitions of transition services under IDEA and the Rehabilitation Act of 1973 are very similar and there is no statutory definition of transition services under SSI.

programs.⁴⁷ As a result, agencies are limited in their ability to target services to recipients who might benefit from them. Moreover, integrating information about students served by multiple programs over time would allow agencies to assess the impact of transition services across programs, according to Education and SSA officials. In addition, officials said sharing information about common service recipients would help agencies serve students with disabilities in a more streamlined way. For instance, SSA could identify students receiving employment and training services through other federal programs and provide counseling to help them understand how paid employment affects their SSI benefits and health insurance, with an eye toward helping students attain greater economic self-sufficiency. Officials cautioned, however, that privacy concerns may limit some information sharing and make it difficult to integrate information from multiple systems. While officials noted that the Federal Partners in Transition Workgroup has discussed these information sharing challenges at some of its meetings, one official noted that there is no substantive effort to address them at the federal level.

Officials also identified a lack of clarity on agencies' roles and responsibilities for providing and paying for transition services as another coordination barrier. For example, each program has its own statutory authority, permitting it to pay only for certain services or types of services. This can create confusion, particularly at the state and local levels, about who is responsible for paying for a particular service. It can also result in frequent debates about which agency is responsible for funding services, according to some officials, creating a disincentive for agencies to work together. While certain state agencies such as educational agencies and VR agencies are required to articulate roles and responsibilities in interagency agreements,⁴⁸ Education officials suggested that a program's authorizing statute should clearly define agency responsibilities to help

⁴⁷ Education officials noted that federal agencies have recently begun working to improve data collection and sharing. Education also updated its regulations on the Family Educational Rights and Privacy Act and clarified the means by which education entities, including school districts, can collect and share data with other agencies. 76 Fed. Reg. 75,604 (Dec. 2, 2011) (codified at 34 C.F.R. pt. 99) (2011). We also previously reported on efforts to develop statewide longitudinal data systems that link education and employment databases. See GAO, *Postsecondary Education: Many States Collect Graduates' Employment Information, but Clearer Guidance on Student Privacy Requirements Is Needed*, [GAO-10-927](#) (Washington, D.C.: Sept. 27, 2010), 4.

⁴⁸ 34 C.F.R. § 300.154 (2011).

avoid confusion and minimize potential delays and disruptions in delivering transition services.

Agencies Lack a Government-wide Strategy or Framework for Coordinating Transition Services

Although federal agencies are engaged in some coordination efforts, these efforts represent a patchwork approach and officials at all four agencies indicated there is no single, formal, government-wide strategy for coordinating transition services. While such a strategy is not required, we have previously cited the need for an overall federal strategy and government-wide coordination to align policies, services, and supports among the various disability programs, which include supports for transition-age students.⁴⁹ Agency officials acknowledged that coordination specifically on transition services could be improved. For example, one official said agencies could work collaboratively to identify opportunities to address legislative and regulatory barriers to coordinating transition services. Officials added that improved data collection and sharing could help agencies adopt a more coordinated and crosscutting approach to delivering transition services to students with disabilities. Labor officials leading the Federal Partners in Transition Workgroup said that, while an overall plan for transition remains beyond the group's scope of work, a framework that identifies what is needed for a successful transition could be used at the federal level to review collaboration across systems and to identify definition, service, and funding gaps.⁵⁰ Such a framework could also be used at the local level to identify gaps in communities and individual plans.

Federal Agencies Do Not Assess the Effectiveness of Their Coordination Efforts

It is unclear whether existing federal coordination efforts have had a positive effect on access to transition services because agencies do not assess their coordination efforts. We have reported that developing mechanisms to monitor, evaluate, and report on the results of their coordination efforts can help key decision makers within agencies, as well

⁴⁹ [GAO-11-278](#).

⁵⁰ According to Education and Labor officials, this framework is referred to as the "Guideposts to Success" and was developed by Labor's Office of Disability Employment Policy, in collaboration with the National Collaborative on Workforce Disability for Youth (<http://www.ncwd-youth.info/guideposts>). According to Labor officials, the framework currently includes the following components of a successful transition: school-based preparatory experiences, career preparation and work-based learning experiences, youth development and leadership, connecting activities, and family involvement and supports.

as clients and stakeholders, obtain feedback for improving both policy and operational effectiveness. For example, coordinating agencies could require members with lead responsibilities for a focus area to report on their progress in achieving defined objectives.⁵¹ Federal officials said that coordination has helped improve relationships and communication across agencies administering transition services, yielding an increased understanding of each other's research, policy, and evidence-based practices as a result of their involvement in interagency efforts, including the Federal Partners in Transition Workgroup. Agency officials also told us that some coordination efforts have led to increased engagement in transition policy by students with disabilities and their families and improved results in achieving career readiness and self-sufficiency. However, these results are difficult to corroborate because agencies do not evaluate the impact of their efforts, and in many cases do not track coordination outcomes at the federal level, according to agency officials.⁵² Furthermore, the effectiveness of existing federal coordination efforts is questionable, as evidenced by persistent challenges students with disabilities face navigating multiple programs.

Some federal agencies monitor compliance with requirements for grantees to coordinate with other state and local entities under individual programs. For example, Part B of IDEA requires state educational agencies to report annually on their performance using 20 indicators established by the Secretary.⁵³ One of the indicators measures the state's compliance with the requirement under IDEA to include postsecondary goals and transition services in the IEPs of students age 16 and above; and to invite the student and, if appropriate, representatives from other participating state agencies to the student's IEP team meetings if transition services are to be discussed.⁵⁴ Similarly, state VR agencies must report annually to the Rehabilitation Services Administration on

⁵¹ [GAO-06-15](#).

⁵² Labor officials said the intra-agency Youth with Disabilities Workgroup tracks progress toward outcomes through an informal internal work plan. Officials participate in monthly meetings to discuss status updates on policy guidance issuance, leveraging resources, upcoming webinars, and innovative initiatives.

⁵³ 20 U.S.C. § 1416(b)(2)(C)(ii)(II).

⁵⁴ Part B-SPP/APR Related Requirements, <http://www2.ed.gov/policy/speced/guid/idea/bapr/index.html>.

whether they have identified the responsibilities of other agencies through statute, regulation, or written agreements, and to undergo monitoring of their coordination activities.⁵⁵ These monitoring reviews, however, mainly address compliance with programmatic and fiscal requirements, help ascertain whether state agencies have in place signed formal interagency agreements, and check whether these agreements include key components such as providing technical assistance to school districts on transition planning. Agency officials noted that there are no quantifiable measures to assess how effectively transition services are coordinated, and that any assessment is typically based on observation and a review of practices and procedures rather than on data.⁵⁶

Conclusions

The current federal approach to assisting students with disabilities in their transition to postsecondary education or the workforce necessitates that students and their parents navigate multiple programs and service systems to piece together the supports these students need to achieve maximum independence in adulthood. Under this complex structure, information dissemination and service coordination are essential. Without receiving accurate and timely information about available services, students may miss opportunities to access needed services that could mean the difference between achieving an optimal level of self-sufficiency and relying on public assistance to meet their basic needs. While officials report that federal agency coordination efforts, such as the Federal Partners in Transition Workgroup, have improved relationships and built shared knowledge across participating agencies, they have yet to adopt a broader interagency strategic approach to addressing longstanding challenges in providing transition services to students with disabilities. The transition workgroup, in particular, represents a unique vehicle that could provide leadership in developing such a strategy specifically focused on students with disabilities who are transitioning out of high school. Given the multiple agencies involved in supporting this population, in conjunction with multiple eligibility criteria and definitions established in statute, the lack of such a strategy is a missed opportunity to break down coordination barriers and work across agency boundaries. Only then can

⁵⁵ 20 U.S.C. § 1412(a)(12).

⁵⁶ Education officials said they are working with SSA to determine how to track outcomes of transition interventions, including coordination, in SSA's planned evaluation of the PROMISE initiative.

agencies systemically address persistent transition challenges and improve outcomes for students with disabilities. Furthermore, without assessing the effectiveness of federal coordination efforts, agencies are unable to determine what works well, what needs improvement, and where best to direct increasingly constrained federal resources.

Recommendation for Executive Action

To improve the provision of transition services to students with disabilities through enhanced coordination among the multiple federal programs that support this population, we recommend that the Secretaries of Education, HHS, and Labor, and the Commissioner of SSA direct the appropriate program offices to work collaboratively to develop a federal interagency transition strategy. This strategy should address:

1. compatible policies, procedures, and other means to operate across agency boundaries towards common outcomes for transitioning youth and their families;
2. methods to increase awareness among students, families, high school teachers, and other service providers on the range of available transition services; and
3. ways to assess the effectiveness of federal coordination efforts in providing transition services.

To the extent that legislative changes are needed to facilitate the implementation of this transition strategy, agencies should identify and communicate them to the Congress.

Agency Comment and Our Evaluation

We provided a draft of this report to officials at the Departments of Education, HHS, and Labor, and to SSA for their review and comment. Their responses are reprinted, respectively, in appendixes IV, V, VI, and VII of this report. They also provided technical comments, which we incorporated as appropriate.

In their comments, all four agencies agreed with our recommendation and noted that they have been or will be in contact with each other to expedite preliminary discussions on an implementation strategy.

Some of the agencies also described coordination efforts beyond those mentioned in our draft report. Specifically, Education said it is currently engaged in numerous transition coordinating activities with HHS, Labor, and SSA related to discretionary grants, legislative proposals, draft regulations, policy positions, and program improvements. Education

highlighted the National Transition Conference it hosted in May 2012, explaining that the four agencies worked together to plan and participate in all stages of the conference with the goals of raising awareness of services, sharing promising practices, and creating an action agenda to improve transition outcomes for youth with disabilities.

HHS noted that it funds the Consortium to Enhance Postsecondary Education for Individuals with Developmental Disabilities. This consortium conducts research, provides training and technical assistance, and disseminates information on promising practices that support individuals with developmental disabilities to increase their independence, productivity and inclusion through access to postsecondary education. Since 2010, HHS has also collaborated with Education and Labor on Project SEARCH, a program to support local students with disabilities in their last year of high school to experience work opportunities within these federal agencies.

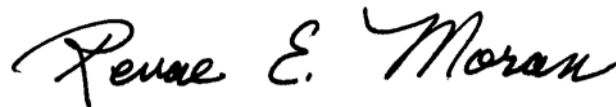
Labor stated that it plans to reach out to Education and SSA to explore ways to formalize its Federal Partners in Transition Workgroup. This group will work to help align policies, services, and supports provided by various programs to transition-age youth with disabilities, and to help identify legislative and regulatory barriers that prevent the coordination of transition services. Moreover, this group would assess the impact of its coordination efforts by developing common outcome goals.

Finally, HHS noted that the Developmental Disabilities Assistance and Bill of Rights Act of 2000 does not provide for direct transition services. In response, we clarified, in figure 1, that the act provides funding for activities that support employment and training for youth with disabilities. HHS also questioned the relevance of several programs included in our list of federal programs that provide transition services, on the basis that the programs do not provide direct services. We agree that one of these programs, Partnership in Employment Systems Change Grants, is intended to enhance collaboration rather than provide transition services; therefore, we removed it from the list. However, we disagreed that the Youth Information, Training and Resources Centers program be omitted from the list. It provides self-advocacy services that we consider to be a type of transition service for youth. Similarly, we disagreed that Developmental Disabilities Protection and Advocacy should be omitted from the list. This program provides information on transition services and supports to youth, among other things. Consequently, both programs are still included.

As agreed with your office, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the Secretaries of Education, HHS, and Labor, as well as the Commissioner of SSA, and other interested parties. In addition, the report will be available at no charge on our website at: <http://gao.gov>.

If you or your staff have any questions concerning this report, please contact me at (202) 512-7215 or moranr@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix VIII.

Sincerely yours,

A handwritten signature in black ink that reads "Revae E. Moran". The signature is written in a cursive style with a large, stylized initial 'R'.

Revae Moran
Director, Education, Workforce and
Income Security Issues

Appendix I: Scope and Methodology

Our review examined the (1) challenges students with disabilities may face accessing federally funded transition services; and (2) extent to which federal agencies coordinate their transition activities. To determine the challenges students with disabilities may face accessing transition services as they leave high school for postsecondary education or the workforce, we selected a nongeneralizable sample of five states and interviewed state and local officials responsible for administering the key federal programs that provide transition services. We visited four states: California, Florida, Maryland, and Minnesota, and interviewed officials in Nevada by phone. In the four states we visited, we also met with groups of parents and students with disabilities to discuss the challenges they face. In addition, we met with a number of experts in the field of transition and with associations representing young adults with a wide range of disability types to obtain their perspectives on challenges students face during transition. Finally, we reviewed the definitions of disability and the eligibility criteria in selected federal statutes that govern relevant federal programs providing transition services to identify any potential legislative or regulatory challenges they may pose.

To assess the extent to which the four key federal agencies that administer programs providing transition services—the Departments of Education (Education), Health and Human Services (HHS), and Labor (Labor), and the Social Security Administration (SSA)—coordinate their transition activities, we interviewed agency officials, obtained their written responses to questions about their coordination efforts, and reviewed agency documents. We analyzed this information based on GAO criteria detailing activities that can enhance and sustain collaboration among federal agencies. We conducted this performance audit from July 2011 to July 2012 in accordance with generally accepted governmental auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We selected the five states in our nongeneralizable sample based on the number of grants each state received under key federal programs that provide transition services, recommendations from agency officials and experts, and geographic diversity, to the extent possible. To identify these key federal programs that provide grants to states and localities for

transition services, we searched the Catalog of Federal Domestic Assistance (CFDA)¹ and asked relevant agency officials to verify this list of programs and identify any programs that were not captured in our search results. Based on this search, we identified six federal grant programs that had a specific focus on improving transition services, and we looked at the distribution of grants to select states that received a relatively high number of federal grants for transition services.² We also asked agency officials and experts for their recommendations of states with model programs or promising practices related to transition services and/or state-level collaborative efforts to improve transition outcomes. We did not do an independent legal analysis to verify program information from the CFDA or agency officials. To identify what additional challenges, if any, students may face in states with relatively few programs that provide transition services, we also selected one state with relatively few federal grant programs to determine if the key challenges identified were similar to those in other states.

In each state we visited, we met with officials from state departments of education or special education, higher education, vocational rehabilitation, developmental disabilities, workforce agencies,³ and staff from parent training and information centers.⁴ In addition, with the exception of Nevada, staff from parent training and information centers in

¹ CFDA is a government-wide compendium of federal programs, projects, services, and activities that provide assistance or benefits to the American public. While the General Services Administration (GSA) maintains the CFDA system and website, the content of individual program descriptions is the responsibility of the agency that has issued the program description. The Office of Management and Budget serves as an intermediary agent between the federal agencies and GSA and provides oversight to the necessary collection of federal domestic assistance program data.

² The six federal programs were: Education's Model Comprehensive Transition and Postsecondary Programs for Students with Intellectual Disabilities, Regional Parent Training and Information Technical Assistance Centers, and Rehabilitation Services Administration's Parent Information and Training Projects; HHS's Youth Information, Training and Resource Centers; Labor's Disability Employment Initiative; and SSA's Youth Transition Demonstration Projects.

³ In a few states we visited, our interviews with workforce agency officials included staff from WIA one-stop centers.

⁴ There were three exceptions: In Florida and California, we did not meet with higher education officials, although we did meet with two higher education associations in California; and in Maryland we did not meet with the state workforce agency, although we obtained written responses to our questions from several local workforce entities.

each state assisted us by organizing discussion groups with parents and students with disabilities that were in the process of planning their transition from high school to postsecondary education or employment or had recently made the transition out of high school. In a few states, we also met with officials from centers for independent living, other nongovernmental organizations that received federal grants to provide transition services, and transition specialists and experts. See table 1 for a complete list of the organizations and groups we interviewed. During our interviews, we discussed challenges students with disabilities may face—including legislative or administrative barriers, potential gaps in transition services, knowledge of teachers and other service providers about transition services and options, parent and student awareness of available transition services and options, and coordination among federal agencies providing transition services. Finally, we asked officials from the relevant Education, HHS, Labor, and SSA program offices for their perspectives on the challenges faced by transitioning students with disabilities.

Table 1: Organizations Contacted

Stakeholder	Organizations and groups interviewed
California	State Departments of Education, Rehabilitation, Developmental Services, and Employment Development; State Council on Developmental Disabilities; a Workforce Investment Act One-stop Center; the State Foundation for Independent Living Centers; the State Transition Leadership Team and Transition specialists, experts, and coordinators; representatives from Higher Education groups and institutions; representatives from the State Workability Program; representatives from two Parent Training and Information Centers; and parents of and students with disabilities.
Florida	State Department of Education, Bureau of Exceptional Students and Divisions of Vocational Rehabilitation and Blind Services; State agencies for Persons with Disabilities and Workforce Innovation; Transitions specialists and coordinators; representatives from a Parent Training and Information Center; representative from three non-profit organizations serving transition-age youth; and parents of and students with disabilities.
Minnesota	State Departments of Special Education, Human Services, and Employment and Economic Development, including the State Services for the Blind; Special Education Directors; a representative from a National Center on Secondary Education and Transition; representatives from higher education groups and institutions; representatives from one Parent Training and Information Center; representatives from one non-profit organization serving transition-age youth; and parents of and students with disabilities.
Maryland	State Departments of Education, Divisions of Special Education and Rehabilitation Services, and Disabilities; the State Developmental Disability Administration; the State Higher Education Commission; representatives from one Parent Training and Information Center; representatives from one non-profit organization serving transition-age youth; several local workforce agencies ^a ; and parents of and students with disabilities.
Nevada	State Departments of Special Education and Vocational Rehabilitation; and representatives from one Parent Training and Information Center.

Subject matter experts and Associations	We spoke with 13 experts or groups that focus on transition, including groups representing students with developmental disabilities, students who are deaf or hard of hearing, students with learning disabilities, and students with intellectual and significant developmental disabilities
Federal agencies	<p><u>Education</u>: Office of Special Education Programs; Rehabilitation Services Administration; and the Office of Postsecondary Education.</p> <p><u>Labor</u>: Office of Disability Employment Policy; and Employment and Training Administration</p> <p><u>HHS</u>: Administration on Developmental Disabilities; and Centers for Medicare and Medicaid Services</p> <p><u>SSA</u>: Office of the Deputy Commissioner, Retirement and Disability Policy</p>

Source: GAO.

^aWe received written responses to our interview questions from some of Maryland's local workforce agencies, but did not speak with them in person.

To supplement the information collected during our interviews, we reviewed written responses and documents provided by officials from state and local organizations; reviewed selected statutory language related to some of the main legislative challenges identified by federal, state and local officials; and conducted a limited literature review of recent research related to transition challenges.

To evaluate the extent to which federal agencies coordinate their transition activities, we asked officials from Education, HHS, Labor, and SSA to complete a data collection instrument we developed that requested information on their coordination efforts and activities relating to transition services. We reviewed agency officials' written responses to determine whether their efforts were formal or informal, targeted towards transitioning students with disabilities, which agencies were involved, and which specific activities were coordinated. We also interviewed agency officials from relevant program offices at each agency to obtain additional information about ongoing coordination efforts related to transition services. These interviews also addressed inter- and intra-agency coordination efforts related to transitioning students with disabilities, examples of successful outcomes from these coordination efforts, any agency assessments of their coordination efforts, and potential barriers to coordination. In addition, we reviewed and analyzed available documents from each agency, including their strategic plans, performance reports, and agency performance measures; program websites and descriptions; and other relevant agency documents, such as joint technical guidance. We assessed the extent of the agency's coordination efforts based on

GAO's criteria for practices agencies can use to help enhance and sustain interagency collaboration.⁵

To provide an overview of federal programs that provide transition services to youth with disabilities, we identified 21 such programs administered by five federal agencies: Education, HHS, the Department of Justice, Labor, and SSA.⁶ (See app. II). To identify these programs, we first searched the CFDA using key subject terms related to transition services for students with disabilities.⁷ This search produced a preliminary list of programs that was reviewed independently by two analysts. Each analyst reviewed the program descriptions in CFDA and from the relevant program websites, as necessary, and independently determined whether a program should be excluded due to clear lack of relevance to transition services for students with disabilities. The analysts then compared and discussed their decisions to further refine the list of programs.

From this second list, we selected programs that met the following criteria: they (1) exclusively serve individuals with disabilities, including students of transition-age (age 14 to 25); (2) provide transition services directly to youth going from high school to postsecondary education or the workforce and/or services to their families; and (3) received federal funding in fiscal year 2011.

We determined CFDA was sufficiently reliable for our purposes by confirming with federal agency officials that the programs identified met our criteria and obtaining information from agencies about any additional programs for our consideration. Specifically, we asked officials to correct any information we obtained from CFDA and program websites, identify

⁵ [GAO-06-15](#).

⁶ The 21 programs included in this appendix met the specific selection criteria described in this appendix. In contrast, the programs described in the background section of this report are examples of broader programs administered by Education, HHS, Labor, and SSA that support transition-age students with disabilities, although they may not directly provide transition services.

⁷ We determined key subject terms by inputting basic key words, such as 'disability,' 'student,' and 'transition,' into the subject terms field of the CFDA advanced search form. This field produced a list of searchable subject terms related to each of the basic key words. From this list, we selected those subject terms that addressed at least two of the following topic areas: (1) disabilities, (2) youth or students, (3) vocational rehabilitation, and (4) postsecondary education.

any programs meeting our selection criteria that were not included in our search results, and provide additional information on the selected programs.⁸ We followed up with agency officials through teleconferences and email, as necessary, to clarify program information and make a decision to include or exclude programs. We reviewed agency documentation and selected laws and regulations to verify eligibility criteria, including definitions of disability and funding information. To assess the reliability of recipient data reported in our tables, we reviewed agency officials' responses to questions regarding how they collected the data, any potential limitations of the data, and the databases and systems used to maintain the information on program recipients. To assess the reliability of funding data, we reviewed publicly available and agency-provided budget documents. In cases where funding amounts for specific programs were not separately reported, we clarified the information with agency officials and noted that data were reported by the agency. Based on our review of agency officials' responses to our questions and of budget documentation, we determined that the recipient and funding data we reported were sufficiently reliable to include in this report.

⁸ We obtained information on the program title, purpose, services provided, and eligibility criteria from CFDA and program websites. We asked officials to verify or correct this information and provide additional information on funding amounts and recipient data.

Appendix II: Federal Programs that Provide Transition Services to Youth with Disabilities

Tables 2 to 6 of this appendix contain information on various federal programs that provide transition services to youth with disabilities.

Table 2: Education Programs Providing Transition Services to Youth with Disabilities (Ranked by Funding Level)

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data ^a	Funding ^b
Special Education Grants to States	Provide free appropriate public education to all children with disabilities	<ul style="list-style-type: none"> • Instruction • Community experiences • Development of employment and other post-school adult living objectives • Daily living skills • Functional vocational evaluation • Transportation • Physical and occupational therapy 	Child with a disability (i.e., intellectual, emotional, or learning disabilities; hearing, speech, language, visual, or orthopedic impairments; autism; traumatic brain injury; or other health impairments) who needs special education and related services, as determined by a team of qualified professionals and the child's parent	Total number of recipients served in school year 2010-11: 6,558,053 Number and percentage of recipients who were transition-age youth ^c in school year 2010-11: 2,198,474 (34 percent)	Type of funding: Formula grants and program technical assistance to states, fiscal year (FY) 2011 obligations: \$11.5 billion FY 2012 appropriations: \$11.6 billion
Vocational Rehabilitation State Grants	Assist states in creating and operating comprehensive rehabilitation programs to prepare disabled individuals for competitive employment	<ul style="list-style-type: none"> • Job-related services including job search and placement • Vocational guidance and counseling • Vocational or other training services • Assistive and rehabilitation technology • Supported employment • Transportation 	Individual with a disability (i.e., a physical or mental impairment that results in a substantial impediment to employment) who requires vocational rehabilitation services to prepare for, secure, retain, or regain employment	Total number of recipients served in FY 2011: 589,773 ^d Number and percentage of recipients who were transition-age youth ^e in FY 2011: 179,535 ^d (30 percent)	Type of funding: Formula grants to states FY 2011 obligations: \$2.9 billion ⁱ FY 2012 appropriations: \$3.1 billion

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data^a	Funding^b
Centers for Independent Living	Establish, operate, and provide financial assistance to a statewide network of centers for independent living, designed to enhance independence and productivity of individuals with significant disabilities	<ul style="list-style-type: none"> • Information and referral services • Independent living skills training • Peer counseling • Advocacy 	Individual with a significant disability means an individual with a severe physical or mental impairment whose ability to function independently in the family or community or whose ability to obtain, maintain, or advance in employment is substantially limited and for whom the delivery of independent living services will improve the ability to function, continue functioning, or move toward functioning independently in the family or community or to continue in employment, respectively	Total number of recipients served in FY 2011: 238,005 Number and percentage of recipients who were transition-age youth ^f in FY 2011: 31,703 (13 percent)	Type of funding: Grants to consumer-controlled, community based, cross-disability, nonresidential private nonprofit agencies FY 2011 obligations: \$80.1 million FY 2012 appropriations: \$80 million
American Indian Vocational Rehabilitation Services	Provide vocational rehabilitation services to American Indians with disabilities residing on or near Federal or State reservations and help them prepare for and engage in gainful employment	<ul style="list-style-type: none"> • Job-related services including job search and placement • Vocational guidance and counseling • Vocational or other training services • Assistive and rehabilitation technology • Supported employment • Transportation 	American Indian (i.e., person who is a member of any federal or state Indian tribe or community) with a disability (i.e., a physical or mental impairment that results in a substantial impediment to employment)	Total number of recipients served in FY 2011: 8,130 (approx.) Number and percentage of recipients who were transition-age youth ^e in FY 2011: Data on age of individuals served not collected	Type of funding: Grants to governing bodies of Indian tribes or consortia of those governing bodies located on federal and state reservations FY 2011 obligations: \$43.6 million FY 2012 appropriations: \$37.9 million

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data^a	Funding^b
Supported Employment Services for Individuals with the Most Significant Disabilities	Provide supplemental funds to state vocational rehabilitation agencies to help support the cost of supported employment services for individuals with the most significant disabilities participating in the VR State Grants program	<ul style="list-style-type: none"> On-the-job and systematic training Job development Follow-up services Observation and supervision at training sites 	Individual eligible for vocational rehabilitation services, determined to have a most significant disability, and for whom supported employment is the rehabilitation objective based on a comprehensive assessment of rehabilitation needs	Total number of recipients served in FY 2011: 34,667 ^d Number and percentage of recipients who were transition-age youth ^e in FY 2011: 13,454 ^d (39 percent)	Type of funding: Formula grants to state vocational rehabilitation agencies FY 2011 obligations: \$29.1 million FY 2012 appropriations: \$29.1 million
Special Education—Parent Training and Information Centers	Ensure parents of children with disabilities receive training and information to help improve results for their children	<ul style="list-style-type: none"> Financial support of parent information centers and community parent resource centers Technical assistance 	Parent of child or youth with a disability (i.e., intellectual, emotional, or learning disabilities; hearing, speech, language, visual, or orthopedic impairments; autism; traumatic brain injury; or other health impairments) or parent who suspects their child may have a disability or has been inappropriately identified as having a disability	Total number of recipients served in FY 2011: 1,498,007 ^g Number and percentage of recipients who were transition-age youth ^e in FY 2011: 107,600 ^g (parents of transition-age youth) (7 percent)	Type of funding: Project grants to parent organizations FY 2011 obligations: \$28 million FY 2012 appropriations: \$28.9 million
Assistive Technology State Grants	Maximize access to assistive technology devices and assistive technology services for individuals with disabilities and their family members	<ul style="list-style-type: none"> Assistive technology devices and services 	Individual with a disability (as defined by any federal or applicable state law) who would be enabled by assistive technology device or service to minimize deterioration in functioning, to maintain a level of functioning, or achieve a greater level of functioning in any major life activity	Total number of recipients served in FY 2011: 1,375,472 Number and percentage of recipients who were transition-age youth in FY 2011: Data on age of individuals served not collected.	Type of funding: Formula grants to states FY 2011 obligations: \$25.6 million FY 2012 appropriations: \$25.6 million

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data^a	Funding^b
Independent Living State Grants	Expand and improve independent living services to individuals with significant disabilities. Services are intended to promote full integration and inclusion of individuals into mainstream society	<ul style="list-style-type: none"> • Core independent living services, including training • Support independent living centers operations • Outreach to unserved and underserved populations 	Individual with a significant disability means an individual with a severe physical or mental impairment whose ability to function independently in the family or community or whose ability to obtain, maintain, or advance in employment is substantially limited and for whom the delivery of independent living services will improve the ability to function, continue functioning, or move toward functioning independently in the family or community or to continue in employment, respectively	Total number of recipients served in FY 2011: 59,391 Number and percentage of recipients who were transition-age youth ^f in FY 2011: 4,826 (8 percent)	Type of funding: Formula grants to states FY 2011 obligations: \$23.4 million FY 2012 appropriations: \$23.4 million
Protection and Advocacy of Individual Rights	Support systems for protection and advocacy for the rights of individuals with disabilities who are ineligible for advocacy services from other programs	<ul style="list-style-type: none"> • Information and technical assistance • Advocacy services • Legal representation, including legal counsel and litigation services 	Individual with a disability (i.e., a physical or mental impairment that results in a substantial impediment to employment) who requires vocational rehabilitation services to prepare for, secure, retain, or regain employment and who needs protection and advocacy services beyond the scope of other programs	Total number of recipients served in FY 2011: 14,739 Number and percentage of recipients who were transition-age youth in FY 2011: Data on age of individuals served not collected	Type of Funding: Formula grants to designated protection and advocacy agencies FY 2011 obligations: \$17.7 million ^{h,i} FY 2012 appropriations: \$17.7 million ^{h,i}

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data^a	Funding^b
Model Comprehensive Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSID)	Create or expand model comprehensive transition and postsecondary programs for students with intellectual disabilities. Funds also support a coordinating center that provides related services	<ul style="list-style-type: none"> • Technical assistance and information • Academic enrichment • Socialization • Independent living skills, including self-advocacy • Integrated work experiences and career skills • Individual planning for course of study 	Student with an intellectual disability (i.e., cognitive impairment with significant limitations in intellectual and cognitive functioning and adaptive behavior) who is or was eligible for special education and related services	<p>Total number of recipients served in FY 2011: 507</p> <p>Number and percentage of recipients who were transition-age youth in FY 2011: 430 (85 percent)</p>	<p>Type of funding: Grants to institutions of postsecondary education</p> <p>FY 2011 obligations: \$11 millionⁱ</p> <p>FY 2012 appropriations: \$11 million</p>
Helen Keller National Center for Deaf-Blind Youth and Adults	Maximize employment and independent living opportunities for deaf-blind individuals by providing services to those individuals, their families, and service providers nationwide	<ul style="list-style-type: none"> • Training, counseling, and technical assistance • Service projects • Work experiences and internships • Vocational and rehabilitation services • Short-term training for youth in secondary education 	Individual who is deaf-blind (i.e., has a low central visual acuity with corrective lenses, a visual field defect, or a progressive visual loss; has a severe chronic hearing impairment or progressive hearing loss; and has extreme difficulty attaining independence in daily life activities or employment due to these impairments)	<p>Total number of recipients served in FY 2011: 1,356</p> <p>Number and percentage of recipients who were transition-age youth in FY 2011: Data on age of individuals served not collected.</p>	<p>Type of Funding: Non-competitive grant to Helen Keller Services for the Blind, Inc.</p> <p>FY 2011 obligations: \$9.1 millionⁱ</p> <p>FY 2012 appropriations: \$9.1 million</p>
Protection and Advocacy for Assistive Technology	Support protection and advocacy services to assist in the acquisition, utilization, or maintenance of assistive technology devices and services for individuals with disabilities	<ul style="list-style-type: none"> • Information services • Advocacy services • Legal representation 	Individual with a disability (as defined by any federal or applicable state law) who would be enabled by an assistive technology device or service to minimize deterioration in functioning or achieve a greater level of functioning in any major life activity	<p>Total number of recipients served in FY 2011: 2,089</p> <p>Number and percentage of recipients who were transition-age youth in FY 2011: Data on age of individuals served not collected</p>	<p>Type of Funding: Formula grants to designated protection and advocacy agencies</p> <p>FY 2011 obligations: \$4.3 million</p> <p>FY 2012 appropriations: \$4.3 million</p>

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data^a	Funding^b
Rehabilitation Services Demonstration and Training Programs (Transition Model Demonstration Grants)	Provide financial assistance to projects and demonstrations that expand and improve the provision of rehabilitation and related services	<ul style="list-style-type: none"> • Technical assistance • Supported employment • Parent information and training • Career preparatory and pre-employment experiences • Youth development activities • Practices to enhance family involvement 	Individual with a disability (i.e., a physical or mental impairment that results in a substantial impediment to employment) who requires vocational rehabilitation services to prepare for, secure, retain, or regain employment	Total number of recipients served in FY 2011: 2,096 Number and percentage of recipients who were transition-age youth in FY 2011: 2,096 (100 percent)	Type of funding: Grants to states and public or nonprofit organizations FY 2011 obligations: \$3 million ^{l,j} FY 2012 appropriations: \$0 (funding for program ended in FY2011)

Source: Catalog of Federal Domestic Assistance and information provided by Department of Education officials.

^aData reported on transition-age youth refer to youth ages 14 to 25, unless otherwise noted. All recipient data reported by agency officials.

^bFunding data obtained from publicly available and agency-provided budget documentation, unless otherwise noted.

^cIncludes youth ages 14 to 22 only; program services end when youth turn 22.

^dReflects number of recipients whose cases were closed in FY 11. Cases may not have been closed for all individuals who received services in FY 11, but information on age is only reported at case closure. For the Vocational Rehabilitation Grants to States program, 1 million individuals were served in FY 11. 34 C.F.R. § 361.42 (2011).

^eFor this program, data reported are for individuals ages 14 to 24.

^fIncludes youth ages 5 to 24. However, officials reported the preponderance of recipients is older than age 14.

^gReflects the number of instances of services provided. Youth, parents, and professionals may request information from the centers more than once.

^hAmount includes funds used to support training and technical assistance.

ⁱData reported by agency officials.

^jOfficials reported that this amount represents obligations for transition model demonstration grants only.

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

Table 3: HHS Programs Providing Transition Services to Youth with Disabilities (Ranked by Funding Level)

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data^a	Funding^b
Medicaid Infrastructure Grant	Develop infrastructure, including linkages between Medicaid and other employment-related service agencies, supporting competitive employment opportunities for individuals with disabilities	<ul style="list-style-type: none"> Removal of systemic barriers to employment and enhancements to state Medicaid programs and services. Specific services may include: Personal assistance Supported employment Benefits counseling 	Individual who is eligible for Supplemental Security Income program or was previously eligible but is determined to have medically improved	Total number of recipients served in FY 2011: Data not collected at service recipient level Number and percentage of recipients who were transition-age youth in FY 2011: Data not collected at service recipient level	Type of funding: Grants to state Medicaid agencies FY 2011 obligations: \$70 million ^c FY2012 appropriations: \$0 (funding for program ended in FY 2011)
Developmental Disabilities Protection and Advocacy	Support protection of legal and human rights of individuals with developmental disabilities	<ul style="list-style-type: none"> Complaints investigation Mediation Alternative dispute resolution and litigation Information on transition services and supports, such as benefits counseling 	Individual with a developmental disability (i.e., a severe, chronic disability attributable to a mental and/or physical impairment, manifested before age 22 and likely to continue indefinitely, resulting in substantial functional limitations, and reflecting the need for lifelong or extended services)	Total number of recipients served in FY 2010: 21,155 Number and percentage of recipients who were transition-age youth ^e in FY 2010: 13,750 (65 percent)	Type of Funding: Formula grants to states. FY 2011 obligations: \$40.9 million ^c FY 2012 appropriations: \$40.9 million

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data^a	Funding^b
Developmental Disabilities Projects of National Significance — Youth Information, Training and Resource Centers, National Youth Information Centers	Increase and support the independence, productivity, and community integration and inclusion of individuals with developmental disabilities. Youth projects provide capacity building in self advocacy for postsecondary education, training, and employment	<ul style="list-style-type: none"> • Training • Information dissemination • Outreach 	Youth with a developmental disability (i.e., a severe, chronic disability attributable to a mental and/or physical impairment, manifested before age 22 and likely to continue indefinitely, resulting in substantial functional limitations, and reflecting the need for lifelong or extended services)	Total number of recipients served in FY 2011: 11,831 Number and percentage of recipients who were transition-age youth in FY 2011: Data on age of individuals served not collected	Type of funding: Grants to state and local agencies and nonprofit organizations. FY 2011 obligations: \$100,000 ^c FY 2012 appropriations: \$0
Section 1915(c) and (i) Home and Community Based Services	Allow states to provide long term care services in home and community based settings, as an alternative to institutional care, under the Medicaid program	<ul style="list-style-type: none"> • Case management • Independent living assistance • Family training • Supported employment • Environmental modifications • Other services as approved 	Individual that meets targeting criteria for a waiver (e.g., age and condition; a state may have a number of waivers targeting different groups) and needs-based criteria (e.g., institutional level of care or other level determined by the state)	Total number of recipients served in 2010: 274,657 ^{d,f} Number and percentage of recipients who were transition-age youth in 2010: Data on age of individuals served not collected	Type of funding: Matching state-federal partnership FY 2011 federal net expenditures: \$37.1 billion ^d FY 2012 appropriations: Data not available

Source: Catalog of Federal Domestic Assistance and information provided by Department of Health and Human Services officials.

^aData reported on transition-age youth refers to youth ages 14 to 25, unless otherwise noted. All recipient data reported by agency officials.

^bFunding data obtained from publicly available and agency-provided budget documentation, unless otherwise noted.

^cData reported by agency officials. FY 11 obligations for the Medicaid Infrastructure Grant include \$23.5 million in carryover funding from previous years.

^dMost recent data available are from FY 10 because state reporting of recipient data to HHS's Centers for Medicare & Medicaid Services lags 18 months behind service provision.

^eIncludes youth ages 5 to 25. Data are not collected for the 14 to 25 age group.

^fAgency officials did not specify whether these data were for the FY.

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

Table 4: Department of Justice Program Providing Transition Services to Youth with Disabilities

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data^a	Funding^b
Juvenile Mentoring Program — Mentoring for Youth with Disabilities Initiative	Provide mentoring services to youth with disabilities who are in the juvenile justice system or at risk of delinquency to ensure they develop into healthy, productive adults	<ul style="list-style-type: none"> Mentoring 	Youth under age 18 with a disability as defined by the Americans with Disabilities Act (i.e., a physical or mental impairment that substantially limits the performance of one or more major life activities)	Total number of recipients served in FY 2011: Data not yet available Number and percentage of recipients who were transition-age youth in FY 2011: Data not yet available	Type of funding: Grants to states, public and nonprofit organizations, and postsecondary institutions FY 2011 obligations: \$2.2 million FY 2012 appropriations: \$78 million appropriated for youth mentoring; no separate allocation for this program

Source: Catalog of Federal Domestic Assistance and information provided by Department of Justice Officials

^aData reported on transition-age youth refer to youth ages 14 to 25, unless otherwise noted. All recipient data reported by agency officials.

^bFunding data obtained from publicly available and agency-provided budget documentation, unless otherwise noted.

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

Table 5: Labor Program Providing Transition Services to Youth with Disabilities

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data^a	Funding^b
Disability Employment Initiative	Improve educational, training, and employment opportunities and outcomes for youth and adults with disabilities who are unemployed, underemployed, and or receiving Social Security disability benefits	<ul style="list-style-type: none"> • School-based preparatory experiences • Career preparation and work-based learning experiences • Youth development and leadership • Family involvement and supports • Connecting activities 	Individuals with disabilities who are eligible for employment and training services under the Workforce Investment Act, Social Security disability beneficiaries, and in the target population of focus as determined by the grantee. Projects with a focus on youth target youth ages 14 to 24 (currently, projects in 4 states serve this specific population)	Total number of recipients served in FY 2011: Data not yet available Number and Percentage of Recipients that were transition-age youth in FY 2011: Data not yet available	Type of Funding: Grants to states FY 2011 obligations: \$24 million ^c FY 2012 appropriations: \$24 million ^c

Source: Catalog of Federal Domestic Assistance and information provided by Department of Labor officials.

^aData reported on transition-age youth refer to youth ages 14 to 25, unless otherwise noted. All recipient data reported by agency officials.

^bFunding data obtained from publicly available and agency-provided budget documentation, unless otherwise noted.

^cData reported by agency officials.

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

Table 6: SSA Programs Providing Transition Services to Youth with Disabilities (Ranked by Funding Level)

Program	Purpose	Types of transition services provided	Eligibility criteria	Recipient data^a	Funding^b
Ticket to Work	Provide additional choices for employment services for individuals receiving Social Security disability benefits	<ul style="list-style-type: none"> Vocational rehabilitation services Career counseling and job placement Ongoing employment support 	Individuals ages 18 to 65 receiving Social Security disability benefits	Total number of recipients served in 2011: 7,812 ^{c,k} Number and percentage of recipients who were transition-age youth in 2011: 441 ^c (6 percent)	Type of funding: Contract and blanket funding agreements FY 2011 obligations: \$25.7 million ^{d,e} FY 2012 appropriations: \$39 million ^{f,e}
Youth Transition Demonstration	Assist youth with disabilities to successfully transition from school to economic self-sufficiency	<ul style="list-style-type: none"> Individualized work-based experiences Job development Youth empowerment and family supports Social and health services Benefits counseling SSA program waivers^g 	Youth ages 14 to 25 receiving or likely to receive Social Security disability benefits	Total number of recipients served from 2007 to 2012 ^{h,k} : 4,920 Number and percentage of recipients who were transition-age youth from 2007 to 2012 ^h : 2,520 ⁱ (51 percent)	Type of funding: Demonstration grants to states and community organizations FY 2011 obligations: \$1.6 million ^j FY 2012 appropriations: \$1.5 million ^j

Source: Catalog of Federal Domestic Assistance and information provided by Social Security Administration officials

^aData reported on transition-age youth refer to youth ages 14 to 25, unless otherwise noted. All recipient data reported by agency officials.

^bFunding data obtained from publicly available and agency-provided budget documentation, unless otherwise noted.

^cReflects number of recipients for which SSA paid employment networks due to beneficiaries meeting program criteria for work and earnings.

^dReflects amounts SSA paid employment networks.

^eData reported by agency officials.

^fReflects amount available for payment to employment networks.

^gThe Youth Transition Demonstration (YTD) program removes some disability program rules to encourage and reward work. For example, YTD participants may take advantage of earned-income exclusions, which allows SSA to exclude a certain amount of a beneficiary's earned income when determining benefits payments. According to SSA officials, this is a rigorous research project with a random assignment design that will yield real results for this population and help to answer questions about better outcomes. They noted that this is the only research of its kind on this population

^hData are reported for the life of the program (2007 through 2012) because it is a demonstration program.

ⁱUnder the demonstration program, a portion of the participants received services while the remaining participants were placed in a control group.

**Appendix II: Federal Programs that Provide
Transition Services to Youth with Disabilities**

^jAmounts include project funds from Section 1110 (90 percent of funds) and direct apportionments of Section 234 funds (10 percent of funds) authorized under the Social Security Act for research and demonstration projects, which are not part of the annual research appropriations request. Section 234 amounts were reported by agency officials.

^kAgency officials did not specify whether these data were for the FY.

Appendix III: Other Federal Coordination Efforts that Address Individuals with Disabilities, Including Students

Some of the coordination efforts of the Departments of Education (Education), Health and Human Services (HHS), Labor (Labor), and the Social Security Administration (SSA) broadly address youth or individuals with disabilities (see fig. 4). A focus on transition-age students with disabilities may or may not be explicitly included in these federal coordination efforts, but agency officials indicated that all of these efforts include discussions of programs or policy that impact this population in some manner.

Figure 4: Federal Coordination Efforts That Focus on Individuals with Disabilities or Youth

Name and purpose of effort	Education	HHS	Labor	SSA	Key activities coordinated	Mechanisms of coordination
Interagency Committee on Disability Research, Subcommittee on Education^a Identify research gaps and improve information sharing among partners to encourage coordination on disability and rehabilitation research across the federal government	★	●			Guidance to grantees, information exchange through databases and websites	Interagency meetings, regular information sharing, interagency or shared databases
Interagency Working Group on Youth Programs, Subgroup on Positive Youth Development^b Identify promising approaches, strategies, and evidence related to the positive development of youth. Full working group responsibilities include promoting enhanced collaboration at the federal, state, and local levels and developing an overarching strategic plan for federal youth policy		★	●		Polymaking, standards and practices, program planning, information exchange through databases and websites	Interagency agreements, memoranda of understanding, common policies, interagency meetings, joint strategic planning, shared performance measurement and reporting, regular information sharing, interagency or shared databases, cross-training of staff, joint evaluations and reports
President's Committee for People with Intellectual Disabilities Provide advice and assistance to the President and the Secretary of HHS in the field of intellectual disabilities and improve the quality of life for people with intellectual disabilities	●	★	●	●	Polymaking, standards and practices, performance goals and measures	Interagency meetings, regular information sharing, joint evaluations and reports
United We Ride / Federal Coordinating Council on Access and Mobility^c Develop a coordinated approach to leverage public transportation services to disadvantaged persons including those who are elderly, low-income, and those with disabilities	●	●	●		Polymaking, performance goals and measures, guidance to grantees and beneficiaries, program planning	Memoranda of understanding, common policies, interagency meetings, regular information sharing, joint training of grantees, information sessions for beneficiaries

- ★ Agency leads effort
- ☆ Intra-agency effort
- Agency is involved in the effort

Source: GAO analysis of information provided by agency officials.

Note: While some coordination efforts included in this figure involve other federal agencies, we focused on Education, HHS, Labor, and SSA because they administer the key programs that serve students in their transition out of high school. Key activities coordinated and mechanisms of coordination were reported by at least half of the reporting member agencies. For efforts with two key member agencies, only mechanisms and activities reported by both agencies were included.

Appendix III: Other Federal Coordination Efforts that Address Individuals with Disabilities, Including Students

^aParticipating offices from HHS include the National Institutes of Health, Indian Health Service, and Centers for Disease Control and Prevention. The Administration on Developmental Disabilities (ADD) at HHS is planning to re-engage in this effort. Key activities coordinated and mechanisms of coordination were reported by Education.

^bThe Office of the Assistant Secretary for Planning and Evaluation at HHS leads this effort. Key activities coordinated and mechanisms of coordination were reported by Labor.

^cThe Department of Transportation leads this council. ADD at HHS is planning to re-engage in this effort. Key activities coordinated and mechanisms of coordination were reported by Labor.

Appendix IV: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

THE ASSISTANT SECRETARY

Ms. Revac Moran
Director
Education, Workforce, and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

JUN 15 2012

Dear Ms. Moran:

I am writing to provide the U.S. Government Accountability Office (GAO) with comments from the U.S. Department of Education (Department) on the draft report, "STUDENTS WITH DISABILITIES -- Better Federal Coordination Could Lessen Challenges in the Transition from High School" (GAO-12-594). The Department appreciates the work that went into this study. The draft report contains the following recommendation for executive action to the Secretaries of the Departments of Education, Health and Human Services (HHS), Labor (DOL), and the Commissioner of the Social Security Administration (SSA), with three subparts and a suggestion for identifying potential legislative changes that might be needed.

Recommendation for Executive Action

To improve the provision of transition services to students with disabilities through enhanced coordination among the multiple federal programs that support this population, we recommend that the Secretaries of Education, HHS, Labor, and the Commissioner of SSA direct the appropriate program offices to work collaboratively to develop a federal interagency transition strategy. This strategy should address:

1. compatible policies, procedures, and other means to operate across agency boundaries towards common outcomes for transitioning youth and their families;
2. methods to increase awareness among students, families, high school teachers, and other service providers on the range of available services; and
3. ways to assess the effectiveness of federal coordination efforts in providing transition services.

To the extent that legislative changes are needed to facilitate the implementation of this transition strategy, agencies should identify and communicate them to the Congress.

400 MARYLAND AVE. S.W., WASHINGTON, DC 20202-2500
www.ed.gov

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Ms. Revae Moran – Page 2

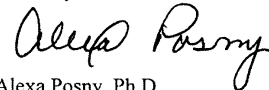
Department of Education Response

The Department of Education is currently engaged in numerous transition coordinating activities with HHS, DOL, and SSA related to discretionary grants, legislative proposals, draft regulations, policy positions, and program improvements. While the draft report provides some helpful examples of coordination, such as the Promoting Readiness of Minors in Supplemental Security Income (PROMISE) grants planning, it does not fully discuss the coordinated efforts that are taking place. We continue to work closely with our agency partners. For example, just this past May 2012, we hosted the National Transition Conference. Together, the Department of Education, HHS, DOL, and SSA planned, collaborated, and participated in all stages of the conference process with the goals of raising awareness of services, sharing promising practices, and creating an action agenda to improve transition outcomes for youth with disabilities.

However, we acknowledge that further work is necessary. We concur with GAO's recommendation that the development of a more formal federal interagency transition strategy would be useful for all four agencies, and an effective strategy could include programs from other agencies as well. We have been in contact with HHS, DOL, and SSA regarding the recommendations and will quickly hold preliminary discussions about how to best implement these recommendations.

Thank you for the opportunity to comment on this draft report. We have also forwarded technical comments and suggestions.

Sincerely,



Alexa Posny, Ph.D.

Appendix V: Comments from the Department of Health and Human Services



DEPARTMENT OF HEALTH & HUMAN SERVICES

OFFICE OF THE SECRETARY

Assistant Secretary for Legislation
Washington, DC 20201

JUN 26 2012

Revae Moran, Director
Education, Workforce, and
Income Security Issues
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Dear Ms. Moran:

Attached are comments on the U.S. Government Accountability Office's (GAO) report entitled: "STUDENTS WITH DISABILITIES: Better Federal Coordination Could Lessen Challenges in the Transition from High School" (GAO-12-594).

The Department appreciates the opportunity to review this draft section of the report prior to publication.

Sincerely,

A handwritten signature in cursive script that reads "Jim R. Esquea".

Jim R. Esquea
Assistant Secretary for Legislation

Attachment

The Department appreciates the opportunity to comment on this draft report.

The purpose of the report was to provide information on: 1) the challenges students with disabilities may face accessing federally funded transition services; and 2) the extent to which federal agencies coordinate their transition services. GAO reviewed relevant federal laws, regulations, and agency documents from the Social Security Administration (SSA) and the Departments of Education, Health and Human Services, and Labor, which administer the key transition programs. GAO also administered a data collection instrument to gather program information from these agencies. Finally, GAO interviewed various stakeholders, including state and local officials, service providers, parents, and a targeted group of students with disabilities.

GAO Findings

GAO found that the current federal approach to assisting students with disabilities in their transition to postsecondary education or the workforce requires the students and their parents to navigate multiple programs and service systems to piece together the supports the students need to achieve maximum independence in adulthood. Under this complex structure, information dissemination and service coordination are essential. Without receiving accurate and timely information about available services, students may miss opportunities to access needed services that could mean the difference between achieving an optimal level of self-sufficiency and relying on public assistance to meet basic needs. While officials report that federal agency coordination efforts, such as the Federal Partners in Transition Workgroup, have improved relationships and knowledge sharing across participating agencies, they have yet to adopt a broader interagency strategy to addressing longstanding challenges in providing transition services to students with disabilities. The Transition Workgroup, in particular, represents a unique vehicle that could provide leadership in developing such a strategy specifically focused on students with disabilities who are transitioning out of high school.

Given the multiple agencies involved in supporting this population, in conjunction with multiple eligibility criteria and definitions established in statute, the lack of such a strategy is a missed opportunity to break down coordination barriers and improve work across agency boundaries. Only through a strategic approach can agencies systemically address persistent transition challenges and improve outcomes for students with disabilities. Furthermore, without an assessment of the effectiveness of federal coordination efforts, agencies are unable to determine what works well, what needs improvement, and where best to direct increasingly constrained federal resources.

GAO Recommendation

To improve the provision of transition services to students with disabilities through enhanced coordination among the multiple federal programs supporting this population, GAO recommends that the Secretaries of Education, HHS, Labor, and the Commissioner of SSA direct the appropriate program offices to work collaboratively to develop a federal interagency transition strategy. This strategy should address:

1. Compatible policies, procedures, and other means to operate across agency boundaries toward common outcomes for transition youth and their families;
2. Methods to increase awareness among students, families, high school teachers, and other service providers on the range of available transition services; and
3. Ways to assess the effectiveness of federal coordination efforts in providing transition services.

To the extent that legislative changes are needed to facilitate the implementation of the transition strategy, agencies should identify and communicate them to Congress.

HHS Response

We agree with GAO's recommendation. We believe that it is important that reasonable, realistic transition plans are included in all individuals with disabilities' educational plans, and that this goal will more likely be realized through enhanced collaboration among federal partners, a more concerted effort to increase awareness of transition programs, and an evaluation of this work in order to better understand the strengths and weaknesses.

The purpose of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (DD Act) is to assure "self-determination, independence, productivity, and integration and inclusion in all facets of community life" for individuals with developmental disabilities and their families. Current challenges are considerable; the graduation rate for people with people with intellectual and developmental disabilities (ID/DD) hovers around 35 percent,¹ less than a quarter of people with ID/DD work in competitive, integrated employment and people with ID/DD experience disproportionately high poverty rates. Among all students, those with the most significant cognitive disabilities are the least likely to graduate with a regular high school diploma.² As the report articulates, students who receive an alternative diploma may face additional challenges.

¹ See, e.g., U.S. Department of Education, (2010). *Individuals with Disabilities Education Act Data – Data Accountability Center*, Exiting Children and students served under IDEA, Part B, in the U.S. and outlying areas by age group, year and disability category, 2008. Table 4-2.

² Wagner, M., Newman, L., Cameto, R., Levine, P, and Garza, N. (2006). An overview of findings from Wave 2 of the National Longitudinal Transition Study-2 (NLTS2). Menlo Park, CA: SRI International.

Even with a diploma, youth with intellectual disabilities demonstrate the lowest rate of paid employment among students with disabilities (29.8 percent), one to four years after exiting high school.³ Given the larger context of low overall rates of employment for people with disabilities,⁴ it is crucially important to support successful transition outcomes for youth, toward pursuing life-long learning and careers. High expectations for all youth, including individuals with developmental disabilities, must be established early and maintained.

HHS strongly agrees with the need for greater coordination and the development of a transition strategy, and underscores that success in shaping the transition from high school for students with disabilities requires a comprehensive and holistic approach, which must include flexible supports, health care, transportation and housing considerations, among other issues. With the understanding that this report focuses on the highest-profile, targeted efforts currently underway within the federal government, successful transition planning requires broad coordination, and GAO might consider future involvement of additional players, including, for example, the Department of Housing and Urban Development, among other important partners. As flagged in opening letter on page one, academic as well as “other supports” are necessary to enable students with disabilities to achieve their goals.

HHS underscores the report’s suggestions regarding the need for increased coordination between programs; the utility of eliminating administrative burden on students and families to provide similar information to multiple programs and problematic gaps or delays in service; the importance of identifying transportation challenges and the provision of necessary services post-high school, such as personal care attendants. Useful, additional suggestions from the report include creating a transition manual and additional training for all professionals who work with students in transition, both of which may require/benefit from additional coordination between agencies.

The report identifies a key obstacle that federal agencies must address to create successful transition outcomes: the requirement for students to prove that their disability limits their ability to work in order to receive SSI benefits, with the corresponding impact on needed health benefits. These current SSI eligibility requirements serve as a disincentive for youth with disabilities to pursue competitive employment. Successful transition planning efforts must also include medical/healthcare transition issues, such as moving from pediatric care to adult care, and benefits management and coordination. Additional elements should include information on accessing reasonable accommodations in the workplace.

³ Newman, L., Wagner, M., Cameto, R., Knokey, A.M., & Shaver, D. (2010). *Comparisons Across Time of the Outcomes of Youth With Disabilities up to 4 Years After High School. A Report of Findings from the National Longitudinal Transition Study-2 (NLTS2)*. Page 37. Menlo Park, CA: SRI International, available at www.nlts2.org/reports/2010_09/nlts2_report_2010_09_complete.pdf.

⁴ See, e.g., Current Disability Employment Statistics reported by the Department of Labor, available at, <http://www.dol.gov/odep/>.

Information dissemination and service coordination within federal agencies, with state and local partners as well as for the public, generally, are essential to improve outcomes for students with intellectual and developmental disabilities. The Federal Partners in Transition Workgroup currently provides one means for sharing information. However, increased collaboration and communication are needed. Though some positive initial efforts have begun, including the recent 2012 National Transition Conference, which included input from several of the agencies included in the GAO report, more must be done toward developing a coordinated, integrated transition strategy.

Additional recommendations for GAO's consideration include the need to emphasize person-centered planning and self-determination in transition planning efforts. GAO may also want to consider the role of and need for coordination with states for transition planning and preparation efforts. For example, state ID/DD agencies play a critical role in determining the direction of the state and federal Medicaid investment. Transition planning efforts should also include coordination of community based non-work activities supported by home and community-based waivers and state funds. Finally, transition planning by federal entities should also include other work-based experiences, such as volunteering, mentoring and community service.

Programs Included in the Report

HHS, through its Administration on Intellectual and Developmental Disabilities (AIDD), works with our partners to achieve the goals embodied in the DD Act, funding capacity-building and systems change efforts to assure that people with intellectual and developmental disabilities and their families participate in the design of and have access to needed community services, individualized supports, and other forms of assistance that promote self-determination, independence, productivity, and integration and inclusion in all facets of community life. The AIDD network consists of three programs that operate in each state and territory: State Developmental Disabilities Councils (SCDDs), University Centers for Excellence in Developmental Disabilities (UCEDDs), and the Developmental Disabilities Protection and Advocacy (PADD) system. AIDD also implements the Projects of National Significance (PNS), which are designed to support the network through data and research projects as well as fund innovative approaches to improving outcomes for those with developmental disabilities.

We note that the organizations contacted in preparation of the report included the State DD Council in California, though not in the other states, and not the other DD Network entities in the select states (UCEDDs and the PADD). We hope that efforts were taken in interviews with parents of and students with disabilities to include the perspectives of people with ID/DD and their families.

Figure 1 is somewhat deceptive in stating that the DD Act provides employment and training services. Priorities for DD Network programs are set at state and local discretion. Those goals and priorities are, again, determined at the state or territory level, rather than coordinated at the federal level, and no federal AIDD funds are currently allocated to provide employment and training services directly. The DD Act largely supports systems-change activities, rather than

direct services. Many AIDD network entities report active engagement related to improving employment outcomes for people with developmental disabilities, through a broad range of activities including development of state and local policies and practices, protection of employment rights, data collection and analysis, and training initiatives. Typically, transition services are not provided directly.

To evaluate federal programs that provide transition services to youth with disabilities, the report identifies a list of selected programs that includes the criteria that they “Provide transition services directly to youth going from high school to post secondary education or the workforce and their families.” With this parameter in mind, the information included in the report with respect to AIDD’s programs (Table 3 includes PADD, though it is listed as “Protection and Advocacy of Individual Rights,” which is the name of a similar program administered by the Department of Education, and certain PNS programs) may not reflect what the report intends to capture.

The Developmental Disabilities Protection and Advocacy program (PADD) provides formula grants to establish and maintain a Protection and Advocacy (P&A) system in each state, to protect the legal and human rights of all persons with developmental disabilities. The P&A system has the authority to pursue legal, administrative, and other appropriate remedies or approaches, including the authority to investigate incidents of abuse and neglect and to access client records. It is inaccurate to categorize the full PADD budget as supporting transition-based services, and to count the number of people served and apply it in this context. PADD services, to protect the legal and human rights of individuals with developmental disabilities, cover a range of priorities, including education and early intervention activities, child care, health-related activities, employment, housing, transportation, recreation, and other services available or offered to individuals in a community, including formal and informal community supports that affect quality of life. It is overly inclusive and inaccurate to list the whole of the P&A funding in a table on transition activities. With respect to tracking recipient data, AIDD does not currently collect data based on transition services nor on the target population identified here, as noted in footnote e. This is also true of the UCEDD and SCDD programs. Although an individual UCEDD or SCDD may determine in its priority-setting and planning process, that it will address transition issues, it would be equally inaccurate to state that the whole of the UCEDD and SCDD program budgets support transition efforts.

PNS resources grants improve access to competitive, integrated supported employment for people with intellectual and developmental disabilities, with a particular focus on youth and young adults, as well as the evaluation of such efforts.

Table 3 includes an entry for Partnership in Employment Systems Change Grants. Six Partnerships in Employment Systems Change projects have been awarded under AIDD’s PNS program. These grantees have partnered with various state agencies to form a consortium to develop and implement initiatives designed to improve the employment outcomes of individuals with intellectual and developmental disabilities, to participate in competitive employment in

integrated settings and improve statewide system policies and practices. The grantees document their systems change efforts throughout the project period. Please note that these projects are not intended or designed to provide direct services. These grants focus on the goal of improving employment outcomes, but do not fund transition services, per se. There are similar problems with respect to the Youth Information, Training and Resource Centers PNS entry included in the chart, as the information provided may be misleading. The project provided training to youth and emerging leaders on various topics including transition. It did not, however, provide direct funding for transition services.

Again, AIDD does not track whether these recipients are transition aged youth. To do so would necessitate a new, resource-intensive reporting effort.

In addition to the information included in the report, AIDD provides funds for the Consortium to Enhance Postsecondary Education for Individuals with Developmental Disabilities, a National Training Initiative through Think College! that conducts research, provides training and technical assistance, and disseminates information on promising practices that support individuals with developmental disabilities to increase their independence, productivity and inclusion through access to postsecondary education resulting in improved long-term independent living and employment outcomes. The Consortium is a national resource for knowledge, training, materials, and dissemination about the participation of individuals with developmental disabilities in postsecondary education.

Also, since 2010, AIDD, the Administration on Children and Families, the Department of Health and Human Services, the Department of Labor and the Department of Education have been involved in Project SEARCH, a program to support local students with disabilities in their last year of high school to experience work opportunities within these federal agencies. Additionally, these federal agencies have worked collaboratively to conduct a Program Evaluation of the Federal Project SEARCH Model.

We hope this additional information provides clarity regarding the programs and transition efforts overseen by HHS/AIDD. We look forward to a continued dialogue on how to improve transition services for all students.

Appendix VI: Comments from the Department of Labor

U.S. Department of Labor

Assistant Secretary for
Office of Disability Employment Policy
200 Constitution Avenue, NW
Washington, D.C. 20210



JUN 13 2012

Ms. Revae Moran
Director, Education, Workforce and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Moran:

On behalf of the U.S. Department of Labor (Department), I want to thank you for the opportunity to review and comment on the Government Accountability Office's (GAO) draft report, "Students with Disabilities - Better Federal Coordination Could Lessen Challenges in the Transition from High School" (GAO-12-594).

The Department of Labor (Department) agrees with the report's recommendation to the Secretaries of Education, Health and Human Services, Labor, and the Commissioner of the Social Security Administration to direct the appropriate program offices to work collaboratively to develop a federal interagency transition strategy. We will consider the various strategies articulated in the report.

At the Department, we recognize that all students, and in particular students with disabilities, face challenges when navigating from secondary education into the adult world. The Department is committed to continuing to work collaboratively with our federal partners at the Departments of Education (ED), Health and Human Services (HHS), and the Social Security Administration (SSA). The existing synergy between these agency partners to improve outcomes for youth with disabilities was evidenced just last week at the National Transition Conference held in Washington DC. Together, the Department, ED, HHS, and SSA planned the conference with the goals of raising awareness of services, sharing promising practices, and creating an action agenda to improve transition outcomes for youth with disabilities.

The Department agrees that a more formalized federal interagency transition strategy would be useful in helping to systemically address persistent challenges, break down barriers, and improve post-school outcomes for students with disabilities. Accordingly, consistent with your recommendation, we will be reaching out to the Departments of Education and the Social Security Administration to explore ways to formalize the Federal Partners in Transition Workgroup, led by the Department's Office of Disability Employment Policy, as a possible vehicle. This federal interagency group would help to align policies, services and supports provided by the various programs that provide services to transition-aged youth, and to increase awareness about the range of transition services available among students, families, and high



ODEP WORKFORCE • OPPORTUNITY • LEADERSHIP

Ms. Revae Moran-- Page 2

school teachers and other service providers. In addition, it would work collaboratively to identify and address legislative and regulatory barriers that prevent effective and coordinated transition service delivery, and would assess the impact of its coordination efforts through the use of common outcome goals. To measure its success, the group will consider using the *Guideposts for Success* (see <http://www.ncwd-youth.info/guideposts>), an evidenced-based framework developed and validated by ODEP in collaboration with the involved partner agencies.

Again, thank you for the opportunity to review and comment on the draft report. If you would like additional information, please do not hesitate to call me at 202-693-7880.

Sincerely,



Kathy Martinez

Appendix VII: Comments from the Social Security Administration



SOCIAL SECURITY
Office of the Commissioner

June 19, 2012

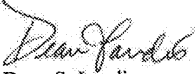
Ms. Revae Moran, Director
Education, Workforce, and Income Security Issues
United States Government Accountability Office
441 G. Street, NW
Washington, D.C. 20548

Dear Ms. Moran:

Thank you for the opportunity to review the draft report, "STUDENTS WITH DISABILITIES: Better Federal Coordination Could Lessen Challenges in the Transition from High School" (GAO-12-594). Our response is enclosed.

If you have any questions, please contact me at (410) 965-0520. Your staff may contact Amy Thompson, Senior Advisor for Records Management and Audit Liaison Staff, at (410) 966-0569.

Sincerely,


Dean S. Landis
Deputy Chief of Staff

Enclosure

SOCIAL SECURITY ADMINISTRATION BALTIMORE, MD 21235-0001

**COMMENTS ON THE GOVERNMENT ACCOUNTABILITY OFFICE DRAFT
COULD LESSEN CHALLENGES IN THE TRANSITION FROM HIGH SCHOOL
(GAO-12-594)**

Recommendation

Recommend that the Secretaries of Education, HHS, Labor, and the Commissioner of SSA direct the appropriate program offices to work collaboratively to develop a federal interagency transition strategy. This strategy should address: 1) compatible policies, procedures, and other means to operate across agency boundaries towards common outcomes for transitioning youth and their families; 2) methods to increase awareness among students, families, high school teachers, and other service providers on the range of available transition services; and 3) ways to assess the effectiveness of federal coordination efforts in providing transition services. To the extent that legislative changes are needed to facilitate the implementation of this transition strategy, agencies should identify and communicate them to the Congress.

Response

We agree. We currently coordinate with the Departments of Health and Human Services (HHS), Labor (DOL), and Education on a number of activities related to the transition of youth with disabilities, but we agree we should explore more coordination and collaboration on common goals and common outcome measures. We are in contact with HHS, DOL and Education regarding the recommendation, and we will expedite preliminary discussions with these departments on an implementation strategy.

Appendix VIII: GAO Contact and Staff Acknowledgments

GAO Contact:

Revae E. Moran, (202) 512-7215 or moranr@gao.gov

Staff

Acknowledgments:

In addition to the contact named above, Meeta Engle (Assistant Director), Nora Boretti (Analyst-in-Charge), Rachel Batkins, Brenna Guarneros, and Jennifer McDonald made significant contributions to this report. In addition, assistance, expertise, and guidance were provided by Susan Anthony, James Bennett, Amy Buck, Susannah Compton, Elizabeth Curda, Jill Lacey, Kathy Leslie, Craig Winslow, and Carolyn Yocom.

Related GAO Products

High Risk Series: An Update. [GAO-11-278](#). Washington, D.C.: February 2011.

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