# RSM 2, Attachment 1700-4

# Comprehensive Transition Program (CTP) Desk Reference

Updated: 10/20

## What is a Comprehensive Transition Program (CTP)?

A CTP is a degree, certificate, or non-degree post-secondary program for **students with intellectual disabilities** that:

* Is offered by a college or career school and approved by the U.S. Department of Education (USDE),
* Is designed to support students with intellectual disabilities who want to continue academic, career, and independent living instruction to prepare for gainful employment,
* Offers academic advising and a structured curriculum, and
* Requires students with intellectual disabilities to participate, for at least half of the program, in:
  + Regular enrollment in credit-bearing courses with nondisabled students,
  + Auditing or participating (with nondisabled students) in courses for which the student does not receive regular academic credit,
  + Enrollment in noncredit-bearing, non-degree courses with nondisabled students, or
  + Internships or work-based training with nondisabled individuals.

## Are students enrolled in a CTP considered a Student with a Disability?

If a student is enrolled in a CTP program and is 14-21 years old, the student would meet the definition of a Student with a Disability and qualify for Pre-Employment Transition Services (Pre-ETS).

On September 17, 2019, the United State Department of Education provided clarification for the purpose of “Increasing Postsecondary Opportunities and Success for Students and Youth with Disabilities.” This clarification was a shift in RSA's position around CTPs, with regard to Students with Disabilities. RSA clarified that a student who is enrolled in a CTP program is now considered a Student with a Disability.

Prior to this time, RSA's position had been that if a student was solely enrolled in a CTP program, and that program did not yield a recognized credential (most which do not), the student would not be considered a Student with a Disability. However, students enrolled in a USDE-approved CTP may now be considered a Student with a Disability as long as they meet all other requirements of being a “Student with a Disability.” For all other education programs, the student must be enrolled in a program that will yield a credential.

## Are there any CTPs in Maryland?

No, there are currently no CTPs in Maryland (as of 4/2020).

* [National list of CTPs](https://studentaid.gov/understand-aid/eligibility/requirements/intellectual-disabilities)

Colleges and universities in Maryland have post-secondary programs that target students with disabilities (e.g., Montgomery College’s [Graduate Transition Program](https://www.montgomerycollege.edu/workforce-development-continuing-education/developmental-education/gtp.html)). However, to date, none of these programs have completed the process of becoming a CTP and therefore are not considered a CTP.

## How and when would DORS support a student's participation in a CTP?

DORS may utilize VR funding to pay for an individual to participate in a CTP if it is found to be a necessary service in support of an individual's IPE goal, as determined by the individual and the DORS counselor, and identified on the IPE. VR agencies may provide funding for a student to participate in a CTP; however, they are not required to do so.

## Can Pre-ETS funding be used to pay for a student’s participation in a CTP?

No. A CTP is not considered one of the five Pre-ETS.

## Are there other funding options for students with intellectual disabilities to participate in CTPs?

Yes. If an individual has an intellectual disability, they may receive funding from the [Federal Pell Grant](https://studentaid.gov/understand-aid/types/grants/pell), [Federal Supplemental Educational Opportunity Grant](https://studentaid.gov/understand-aid/types/grants/fseog), and [Federal Work-Study](https://studentaid.gov/understand-aid/types/work-study) programs if they:

* Are enrolled or accepted for enrollment in a CTP for students with intellectual disabilities at an institution of higher education (a college or career school) that participates in the **federal student aid programs**;
* Are maintaining **satisfactory academic progress**; and
* [Meet the basic federal student aid eligibility requirements](https://studentaid.gov/understand-aid/eligibility/requirements), except that they are not required to have a high school diploma or GED and are not required to be pursuing a degree or certificate.

## Do all students enrolled in a CTP automatically qualify for Pre-ETS, regardless of their age?

No. In order to qualify as a Student with a Disability, one must still meet all of the following criteria:

* Is at least 14 but no more than 21 years of age (has not yet reached 22nd birthday).
* Has a disability, and has submitted the required qualifying medical documentation signed by a medical provider or a copy of IEP or 504 Plan.
* Has documentation confirming enrollment as a student in an educational program, including:
  + Secondary school, including home school and alternative school programs (e.g., those housed within the juvenile justice system), post-secondary education programs approved by a state’s Higher Education Commission (i.e., Maryland Higher Education Commission),
  + Adult basic educational program which leads to a recognized educational credential (e.g. GED or high school diploma),or other recognized educational program, including a CTP, and has not exited, graduated, or withdrawn.