



November 19, 2018
Department of Labor
Employment and Training Administration

Dear ETA,

The Washington Technology Industry Association (WTIA) is a trade association with over 900 member companies. We serve some of the most influential tech companies including: Microsoft, Amazon, Google, Facebook, Expedia, Tableau, and DocuSign but also serve hundreds of smaller tech firms inventing new products and services in Artificial Intelligence, Autonomous Vehicles, Predictive Modeling, Healthcare, and Blockchain.

For the past 3 years, Apprenti (apprenticareers.org) has served as the sector intermediary for a US Department of Labor program to create new tech apprenticeships across the country through AAI grant and contracts. As a sponsor of Apprenti and as a co-op, we have a very clear understanding of the workforce development challenges and initiatives underway in our industry.

We are encouraged by the intent of IRAP to streamline government regulations and to more effectively serve the needs of industry. There are industry sectors that might benefit from this streamlining process. However, the tech industry is not likely to be one of those.

The tech industry does not generally employ unpaid internships for technical jobs. The incredible shortage of talent in the market makes it untenable for employers to offer unpaid internships in the marketplace. Also, the vast majority of tech companies that employ interns in technical functions derive value during the training period and very often seek to hire those same interns for full-time employment as soon as the intern is willing to move to full-time. This has been a successful system for decades and has zero regulation or government oversight. Therefore, IRAP would be seen by the vast majority of tech employers, especially small companies who in aggregate employ the most workers, as burdensome when compared to internships.

Meanwhile, the tech industry is now in year three of an attempt to deploy nationally registered apprenticeships. Early indications are that the 2000 hour OJT requirement is barely sufficient for many tech jobs, and is not sufficient for software developers. The much lower requirement in IRAP is therefore untenable for all but the most menial of jobs. The registered apprenticeship model is now being adopted by our industry and we anticipate rapid growth in the years to come.

Therefore, while it makes sense to make IRAP available to all employers, we do not expect adoption in our industry.

Sincerely,

Michael Schutzler, CEO