



1331 Pennsylvania Avenue, NW
Suite 600 South
Washington, DC 20004

+1 202-661-8090 tel
+1 202-292-4612 fax
www.ipc.org

Adele Gagliardi
Administrator
Office of Policy Development and Research
U.S. Department of Labor
200 Constitution Avenue, NW, Room N-5641
Washington, DC 20210

Apprenticeship Programs, Labor Standards, for
Registration, Amendment of Regulations
Notice of Proposed Rule Making
RIN 1205-AB85
Comments Submitted 26 August 2019
<http://www.regulations.gov>

IPC appreciates the opportunity to provide comments to the U.S. Department of Labor (DOL) on its Notice of Proposed Rule Making (NPRM) Regulatory Information Number 1205-AB85 relating to a new program recognizing Standards Recognition Entities (SREs) of Industry-Recognized Apprenticeship Programs (IRAPs).

For more than six decades, IPC (www.IPC.org) has led the electronics industry through dramatic changes. IPC is the only trade association that brings together all players in this industry: designers, board manufacturers, assembly companies, suppliers, and original equipment manufacturers. More than 5,500 companies around the world depend on IPC programs and services to further their success. As a leading source for industry standards, education and training, market research, and public policy advocacy, IPC supports programs to meet the needs of an estimated \$2 trillion global electronics industry.

IPC welcomes the Administration's focus on workforce development, because a shortage of skilled workers is the electronics industry's top business concern. More than two-thirds of IPC's U.S. members report that an inability to find and retain skilled workers is constraining their growth and undermining their competitiveness in the global marketplace.

In response to our industry's needs, and spurred on by President Trump's Pledge to America's Workers, IPC is making unprecedented investments in its programs to create 1 million new skilled workforce opportunities over the next five years. IPC is working to modernize and better deliver our already-extensive workforce credentialing programs, establish new university chapters, and introduce new curricula and outreach aimed at students in middle and high school. The newly created IPC Education Foundation (www.IPCEF.org) is focused on preparing students for rewarding careers in electronics by providing early and meaningful learning opportunities and by revitalizing interest among American workers in manufacturing careers.

IPC's plans to introduce new apprenticeship programs in the electronics industry is a key aspect of IPC's Pledge to America's Workers. For this reason, IPC welcomes DOL's publication of the proposed rulemaking, and we offer the following comments.

Comment 1 – IPC Supports Apprenticeship Expansion

Workforce experts universally agree that well-crafted apprenticeship programs offer individuals—especially those not planning to go on to higher education—an effective means of gaining the skills and mentoring necessary to thrive in certain fields, including electronics. In many European countries, apprenticeship programs are well-established, meaningful pathways to successful careers. In contrast,

the United States has failed to cultivate an environment in which apprenticeship programs flourish, except outside a few industries. The DOL's commitment to growing the scale and scope of apprenticeship programs, as reflected in the proposal, is commendable, and IPC looks forward to working with DOL to ensure that a final rule creates the ground rules and incentives for IRAPs to succeed in our industry and across all other relevant industry sectors.

Comment 2 – SRE Recognition

IPC strongly agrees that the private sector is best suited to identify the occupational skills that workers need to succeed in the workplace. The authority that would be given to SREs under the proposed rule is designed to leverage industry expertise. However, the rule does not provide sufficient definitions and eligibility rules to ensure that the most qualified and appropriate entities are recognized as SREs. As a result, there is a distinct risk that organizations could be recognized as SREs in fields or job functions where they are ill-equipped or ill-suited to play that role.

Specifically, the electronics industry has many different segments, each of which has built organizations that serve their unique needs. An entity that sought to serve as the SRE for one segment might have wider ambitions but be ill-suited to serve the needs of other industry segments. Safeguards need to be established to ensure that the most appropriate entity is selected for each field and job function, and that the entity that is selected has the full capabilities to establish standards for apprenticeships in their fields.

The success of IRAPs will hinge on the selection of the right SREs. IPC recommends that DOL establish a clear and detailed process for SRE selection based on which organizations are best equipped to serve America's workers. Furthermore, DOL should limit SRE eligibility only to well-established, industry-recognized associations or non-profit entities.

Comment 3 – Credentials

For more than half a century, IPC has been a workforce credentialing organization. Today, more than 300,000 workers with IPC credentials are in the workplace.

In designing our programs, IPC places a high premium on credentials that are portable and demonstrate the person's knowledge, skills and capabilities. Our focus on portable, stackable, and competency-based credentials is important to employers and employees in our industry.

IPC, accordingly, supports DOL's call for apprenticeship programs that require acquisition of portable, competency-based credentials. IPC appreciates DOL's concern that in rare circumstances, portable, competency-based credentials may not always be possible, but IPC strongly recommends that the credentials obtained through IRAPs be competency-based, industry-recognized, and portable.

In terms of industry-recognized credentials, a certificate of completion is insufficient because many industries will not recognize a certificate of completion as validation of a specific level of skill or knowledge.

Furthermore, the portability aspect also requires that credentials be universally recognized and accepted. For example, without portability, a small, state-run association might not offer a credential that would be accepted in other states; and this in turn would limit worker mobility and hinder industry

in two ways. First, fewer people will be willing to pursue apprenticeships since their options will be limited; and second, fewer people will be able to migrate to new locations for new job opportunities, which will cost industry additional time and money to find and train new workers.

Industry recognition and portability requirements work together as essential elements in ensuring that industries can attract and retain talent.

Comment 4 – Industry Exclusions

Per the NPRM, DOL proposes to recognize SREs only in sectors that lack significant registered apprenticeship opportunities. IPC is concerned about the exclusion of any industries from IRAP because divergent programs will create uneven incentives among industries.

Conclusion

In conclusion, IPC supports expanding apprenticeships in the United States and looks forward to working with DOL to address current and future workforce development needs. IPC appreciates the opportunity to address some of our concerns with the NPRM, and we would like to continue our dialogue with DOL and all stakeholders to improve workforce development opportunities for America's workers, particularly as they relate to the electronics industry.

The point of contact for IPC's comments is David Hernandez, Vice President of Education. Thank you.