

CLIENT ALERT

Christian Doctrine Applied to Subcontract

April 5, 2013

As discussed in more detail in a [Crowell Alert](#) issued today, the U.S. District Court for D.C. in *UPMC Braddock v. Harris* (Mar. 30, 2013) relied on the *Christian* doctrine, a rule derived from case law that allows for the inclusion in a contract by operation of law of omitted government contract clauses expressing a significant public procurement policy, to incorporate affirmative action clauses into a subcontract between certain hospitals and a managed care organization with a Federal Employees Health Benefits Program prime contract. This is the first instance of which we are aware that a court has used the *Christian* doctrine to incorporate federal procurement obligations into a subcontract.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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