

## CLIENT ALERT

### DOL Again Applies Expansive Interpretation of "Subcontractor"

Oct.29.2010

In *Office of Fed. Contract Compliance Programs v. Fla. Hosp. of Orlando* (Oct. 28, 2010), a DOL Administrative Law Judge determined that a hospital providing medical services pursuant to an agreement with a TRICARE-managed care support contractor was a government subcontractor for purposes of a DOL audit of the hospital's compliance with its affirmative action and non-discrimination obligations. As discussed further in our blog, the ALJ analogized the hospital's status in this case to the hospital that provided medical services pursuant to an agreement with an FEHBP contractor in the *UPMC Braddock* case last year, which is currently under appeal.

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

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