

## **CLIENT ALERT**

### **OFCCP Issues "Internet Applicant" Definition**

**Oct.12.2005**

The Office of Federal Contract Compliance Programs ("OFCCP") issued a final rule on October 7, 2005, clarifying the definition of an "applicant" in the context of internet recruitment and amending recordkeeping requirements regarding internet applications. This long-awaited clarification narrows the applicant definition previously utilized by the OFCCP, but will require many contractors to modify existing data collection and recordkeeping practices by February 6, 2006, so contractors should initiate a comprehensive review of their selection, applicant tracking, and record retention processes promptly to ensure compliance with this new rule.

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

**Kris D. Meade**

Partner – Washington, D.C.  
Phone: +1 202.624.2854  
Email: [kmeade@crowell.com](mailto:kmeade@crowell.com)

**Rebecca L. Springer**

Partner – Washington, D.C.  
Phone: +1 202.624.2569  
Email: [rspringer@crowell.com](mailto:rspringer@crowell.com)