

Historically Underutilized Business (HUB) Program

Purpose

This Policy provides requirements and guidelines for the TRS Historically Underutilized Business (HUB) program.

Applies To

All full-time and part-time TRS employees, and non-TRS workers (as defined in the Non-TRS Workers policy).

General Statement

TRS promotes full and equal opportunity for all businesses to supply the goods and services needed to support the TRS mission, administrative and logistical operations. TRS will make a good faith effort to increase contract awards and purchases from HUB firms, consistent with the State's HUB participation and overall economic development goals.

As a fiduciary, TRS has a compelling interest to ensure procurement funds are expended in an equal-business-opportunity context. To meet that obligation, TRS shall establish and maintain procurement policies and procedures that do not discriminate with respect to race, color, religion, sex, or national origin.

HUB Planning and Direction

The Executive Director is responsible for the TRS HUB Program. The HUB Coordinator, along with the Director of Procurement and Contracts, Director of Diversity, Equality and Inclusion and Assistant HUB Coordinator plan the HUB Program to meet TRS and state HUB participation goals. They provide functional staff expertise and support, and advise the Executive Director regarding all phases of the HUB program.

The HUB Coordinator is responsible for implementing the TRS HUB program. In addition, the HUB Coordinator shall develop annual strategic goals and action plans necessary for the effective implementation of the HUB program.

Board Reporting and HUB Goals

TRS' Chief of Business Administration will provide an annual HUB report to the TRS Board of Trustees. In addition, the Board of Trustees will determine the HUB goals for TRS annually.

TRS HUB Program

TRS shall implement the following:

- 1 HUB Coordinator. Designate a staff member to serve as the HUB Coordinator for TRS. If not the Director of Procurement and Contracts, the designee shall report to the Director of Procurement and Contracts.

- 2 The HUB Coordinator advises and assists TRS' management and staff in implementing essential HUB program functions including, but not limited to:
 - a. Facilitating compliance with agency good faith effort criteria;
 - b. HUB program reporting;
 - c. HUB program marketing and outreach; and
 - d. Working with Procurement and Contracts staff and TRS contract managers on processes related to HUB program compliance, including the development of procurement specifications and evaluation of contracts for compliance.
- 3 Resources. TRS shall provide resources (financial, human, and equipment) necessary and sufficient for the full and effective implementation of HUB program functions.
- 4 Marketing and Outreach Program. TRS shall work with the TRS' Diversity, Equity and Inclusion (DE&I) department to establish a marketing and outreach program. Outreach strategies involve every practical means for informing the HUB vendor community of business opportunities with TRS.
- 5 Economic Opportunity Forums. The HUB Coordinator and Assistant HUB Coordinator shall participate in economic opportunity forums and fairs sponsored by legislators; Statewide Procurement Division (SPD), a division of the State Comptroller's Office; other institutions; other State agencies; and private business entities.
- 6 Agency Forum Program. TRS shall design an annual HUB Forum and invite state HUB coordinators and HUB businesses for networking opportunities.
- 7 HUB Certification Assistance. An essential function of outreach is to inform the HUB vendor community of the benefits of registration on the Centralized Master Bidders List (CMBL) and application for certification as a HUB firm. All practical assistance shall be provided to facilitate these outcomes.
- 8 HUB Training Program. The HUB Coordinator and Assistant HUB Coordinator shall provide HUB training and support to agency staff, including Procurement and Contracts staff, to effectively implement and maintain the TRS HUB program.
- 9 Training and support will be provided to all staff engaged in daily procurement operations so they are knowledgeable of and can implement HUB program goals, objectives, strategies, and action plans.
- 10 Provide guidance and support to business units so they may establish HUB program goals and objectives as it relates to their division.
- 11 Reporting Processes. Develop and maintain internal and external HUB utilization reporting processes. TRS shall compile and maintain monthly information relating to the use of HUB firms for reporting purposes to the following:
 - a. Internal reporting to Business Units
 - i. The Assistant HUB Coordinator will provide quarterly HUB spend at each business units contract facilitation meeting
 - ii. The HUB Coordinator and Assistant HUB Coordinator will meet with each business unit to review HUB spend
 - b. TRS Board of Trustees
 - i. An annual report of HUB utilization will be provided to the Board
 - ii. The Board will review the information provided to determine annual HUB goals
 - c. Comptroller of Public Accounts (CPA) semiannual and annual reports on expenditures for goods and services specified by object codes reportable under the

HUB program

- i. Information regarding subcontractors and suppliers as required by Texas Government Code Section 2161.122
- ii. Compilation of data by HUB category
- iii. Supplemental Reporting
 1. Report the number of HUBs submitting bids and/or proposals for the acquisition, construction, equipment, or operational implementation of State facilities or programs
 2. Report the number of contracts awarded to businesses with regard to the agency's acquisitions

Promoting Good Faith Effort

The HUB Coordinator and Assistant HUB Coordinator shall work with the Procurement and Contracts staff to develop and implement strategies across all procurement processes (noncompetitive spot purchases, competitive spot purchases, advertisement for bids, requests for proposals, requests for quotations, competitive sealed proposals, design-build, construction manager-at-risk, etc.) that promote HUB utilization.

TRS may further demonstrate good faith efforts by:

1. Establishing rules and procedures for increasing HUB utilization;
2. Documenting outreach efforts, including identification of available HUBs, marketing efforts, and dissemination of information to HUBs; and
3. Complying with HUB reporting requirements.

Contracting for Goods and Services

TRS shall include information on the utilization of Historically Underutilized Businesses (HUBs) in all invitations for bids, requests for proposals, or other purchase solicitation documents where subcontracting opportunities are probable and follow the procedures set out therein for award and administration of all contracts with an expected value of \$100,000 or more for the life of the contract.

When subcontracting opportunities are not probable, a HUB subcontracting Plan (HSP) documenting good faith effort is not required. However, additional information will be provided to potential respondents on how to submit an HSP if an awarded vendor should subcontract during the life of the contract.

This Policy does not constitute a contract, a promise or guarantee of employment, or a guarantee of access to TRS premises or information resources, as applicable, and may be modified, superseded, or eliminated by TRS without notice to the employee.