

TEXAS STATE UNIVERSITY

VetHUB Subcontracting Determination Form (HDF)

University Staff Guide

Reference for determining applicability and completing the revised HDF

PURPOSE OF THE HDF

The HDF documents Texas State's determination that subcontracting opportunities are NOT probable for a procurement expected to be \$100,000 or more.

Use the HDF only after reviewing the scope for reasonable lots or portions that a prime contractor could subcontract. If subcontracting opportunities are probable, do not use the HDF. Require the current State of Texas Subcontracting Plan instead.

Quick Decision Guide

Question	Action
Is the expected procurement value under \$100,000?	A VetHUB HDF/Subcontracting Plan determination is generally not required under this threshold. Follow the applicable procurement process.
Is the expected value \$100,000 or more?	Review the entire scope for potential subcontracting opportunities before solicitation.
Are subcontracting opportunities probable?	Require the current State of Texas Subcontracting Plan. Do not use the HDF.
Are subcontracting opportunities not probable?	Complete the HDF, obtain VetHUB review/approval, and retain it with the procurement record.

What the Determination Is Based On

- The actual scope of work and deliverables.
- Reasonable lots or portions that could be separated consistent with prudent industry practice.
- Potential staffing, installation, maintenance, implementation, training, delivery, specialty trade, technical support, or other ancillary work.
- Whether separating a portion would create material compatibility, security, warranty, accountability, performance, schedule, or operational risks.

DO NOT BASE THE HDF ON

The prime vendor's VetHUB certification status.

Whether the vendor meets or exceeds a VetHUB participation goal.

A preference for one vendor, administrative convenience, or the statement that the vendor normally performs everything itself.

The absence of a known subcontractor without first considering whether a reasonable subcontracting opportunity exists.

SECTION A - PROCUREMENT INFORMATION

1 Project / Procurement Title

Enter the common name of the purchase, project, solicitation, or service. Use a description that allows the HDF to be matched to the procurement record.

2 Solicitation / Requisition Number

Enter the solicitation or requisition number when available. If the number has not yet been assigned, the field may remain blank until known.

3 Vendor Name / VID (if known)

Complete only when a vendor is already known, such as a cooperative, proprietary, or other identified-source purchase. Vendor identity should not be the basis for determining whether subcontracting opportunities are probable.

4 Estimated Maximum Contract Value

Enter the maximum expected value of the procurement, including the initial term and any options, renewals, or extensions that are expected to be available under the procurement.

5 Department / Requestor

Identify the University department or requester responsible for the procurement.

6 Buyer / Solicitation Contact

Identify the buyer, contract specialist, or solicitation contact coordinating the procurement.

7 Procurement Type

Select the best fit: Competitive, Cooperative, or Exempt / Other. The procurement method does not by itself determine whether subcontracting opportunities are probable.

8 Date of Determination

Enter the date the scope was reviewed and the subcontracting determination was made. The determination should be completed before the solicitation is issued or the purchase is finalized.

VALUE REMINDER

Use the expected maximum procurement value for the threshold review, not simply the first-year PO amount when the procurement includes additional terms or options.

SECTION B - SUBCONTRACTING REVIEW

Section B is the core of the determination. Review the scope first; then check the applicable categories and answer each question based on what the procurement actually requires.

Scope Areas to Consider

- Installation / site work / construction
- Staffing / temporary or contracted labor
- Maintenance / repair / technical support
- Training / implementation / professional services
- Delivery / logistics / equipment or supplies
- Other separable or ancillary work

How to Answer Review Questions

HDF Question	How to Evaluate It
Were any distinct portions identified that a prime could reasonably subcontract?	Answer Yes if the scope contains a separable work element that another entity could reasonably perform. This does not automatically mean the final determination is 'probable'; continue the review.
If a potential opportunity was identified, was the VetHUB Directory/CMBL reviewed?	Use Yes when a directory search was performed to understand whether certified prospective vendors exist for an identified opportunity. Use N/A when no potential subcontracting opportunity was identified.
Would separating the work create material risks?	Consider integration, warranty, security, technical compatibility, accountability, continuity, performance, schedule, safety, or operational risks. Document these in the justification when they support the determination.
Are subcontracting opportunities probable?	Select No only when the complete review supports an HDF. If Yes, stop and require the current State of Texas Subcontracting Plan.

DIRECTORY SEARCH

The directory search is a supporting review tool, not the sole test. The primary question is whether the scope contains reasonable subcontracting opportunities.

If a potential opportunity exists but you find no qualified VetHUB, document the search and explain the result in the justification.

SECTION C – JUSTIFICATION

Write a Scope-Based Justification

The justification should explain why the work cannot reasonably be divided into subcontracting opportunities. Keep it concise, but include enough detail that another reviewer can understand the determination without relying on institutional knowledge.

Strong Justifications Usually Explain

- What the University is buying.
- Why the services, equipment, licensing, support, or other components must operate as an integrated scope.
- Why any apparent ancillary work is integral to the primary deliverable rather than a reasonable separate subcontracting package.
- Any compatibility, security, warranty, accountability, performance, schedule, or operational risks created by separating the work.
- The result of a VetHUB Directory/CMBL review when one was relevant to the determination.

Examples

Weak / Avoid	Better
“The vendor is not a VetHUB.”	Explain the scope and why no reasonable portion can be subcontracted.
“The vendor will self-perform.”	Explain why the work is integrated or why separating it is impractical based on the scope.
“There are no VetHUBs.”	Identify the potential opportunity, document the directory search, and explain why the search results support the overall determination.
“This is proprietary.”	Explain what is proprietary and why licensing, equipment, support, installation, or other components cannot reasonably be separated.

SUGGESTED JUSTIFICATION STRUCTURE

1. Identify the primary procurement.
2. Identify any related or ancillary work considered.
3. Explain why those elements are integral or cannot reasonably be separated.
4. State the resulting determination: subcontracting opportunities are not probable.

SECTION D - CERTIFICATION, REVIEW, AND RECORDKEEPING

Requester / Buyer Certification

The person completing the HDF certifies that the procurement scope was reviewed and reasonable potential subcontracting opportunities were considered. Complete the name, title, signature, and date fields.

VetHUB Review

Send the completed HDF to hub@txstate.edu for review. The VetHUB reviewer will either approve the determination or return the form for revision. An approved HDF should be retained with the procurement record.

If the HDF Is Returned for Revision

- Clarify the scope or potential separable work.
- Perform or document additional VetHUB Directory/CMBL research if requested.
- Strengthen the justification so it explains the procurement-specific basis for the determination.
- If the review determines subcontracting opportunities are probable, replace the HDF process with the current State of Texas Subcontracting Plan.

Common Questions

Can an HDF be used because the prime vendor says it will self-perform?

No. Self-performance is a vendor performance choice. The University's determination must first be based on whether the scope contains probable subcontracting opportunities.

Does an HDF mean VetHUB participation is not required?

The HDF documents that Texas State determined subcontracting opportunities are not probable for that procurement. If opportunities are probable, the State Subcontracting Plan process applies.

Should I search the VetHUB Directory for every HDF?

Use the directory when a potential subcontracting opportunity is identified or when the search will help support the determination. The scope analysis remains the primary test.

What if the scope changes after the HDF is approved?

Reassess the subcontracting determination. A material scope change can create new subcontracting opportunities.

Where should the approved HDF go?

Retain it with the solicitation, contract request, requisition, or other official procurement record, as applicable.

CONTACT

VetHUB questions and HDF reviews: hub@txstate.edu | 512-245-2521

Use the current HDF template and current State of Texas Subcontracting Plan for all new determinations.