

PEPS Fireside Chat

Question and Answer Discussion

Presentation Title: Veteran Heroes United in Business (VetHUB) Program

Presentation Date: August 7, 2026

Revised: September 4, 2026

Question 1: Can Texas Department of Transportation (TxDOT) provide a list of National Institute of Governmental Processing (NIGP) codes that correspond to the precertification categories (or at least the precertification group) used in the PEPS Request for Proposals (RFPs)?

Answer 1: The HUB NIGP Work Categories Table containing corresponding NIGP codes is available in the non-federal process request for proposal. This may also be found visiting www.TxDOT.gov and navigating to Do business > Engineering, architectural, and surveying consultants > Resources > HUB NIGP Work Categories Table.

Question 2: What is the "screening NIGP code"? What does that mean?

Answer 2: The Screening NIGP Code is the identified code under which it is anticipated to see NIGP codes. The detailed NIGP codes show examples of what are identified as connected, but a respondent may determine which NIGP code to use connected with the solicitation scope of work.

Question 3: You mentioned the VetHUB applicant being prequalified. How do you determine whether the VetHUBs are prequalified to do the work? Are you saying they must be precertified in the work category?

Answer 3: To be listed as a VetHUB firm, that firm must be a Texas certified VetHUB.

Other requirements mentioned in the request for proposal (RFP) must also be met as outlined in the RFP. RFP requirements don't negate the solicitation plan requirements.

If a Texas certified VetHUB firm is not Precertified or established to meet the minimum technical qualifications to perform work under a standard work category, or the VetHUB is not administratively qualified, the Prime Provider firm is required to notify the Texas certified VetHUB firm as outlined in the subcontracting plan. The Texas certified VetHUB will need to confirm they do not meet what the Prime Provider firm needs.

If they respond but lack TxDOT mandatory requirements: Their lack of meeting mandatory TxDOT requirements becomes your documented, legally defensible "Good Faith Effort" reason for non-selection. **Log the disqualification justification:** Explicitly state for example: *"Vendor responded but lacks mandatory TxDOT Precertification for Work Category [X.X.X], which is a core technical requirement of this professional services contract as this is needed for the Task Leader our firm is seeking as we do not have this precertification and do not have a Task Leader for this work category."*

Question 4: How do you document if the VetHUB didn't respond? Is that checking the box "no" under the column "VetHUB response"?

Answer 4: If they don't respond, you have met your Good Faith Effort (GFE) obligation by trying and you must document the non-response, check the box, and send documentation of the e-mail showing the seven days.

Question 5: If a precertification category has multiple NIGP codes listed, do we have to search/notify/document all three NIGP codes, or can we choose one? For instance, 1.8.1 Public Involvement has 3 NIGP codes listed.

1.8.1	Public Involvement	915-03	915-03 – Public Relations Services
		915-73	915-73 – Public Information Services
		962-76	962-76 – Public Meeting Services

Table 1: 1.8.1 Public Involvement Work Category NIGP

Answer 5: The detailed NIGP codes show examples of what are identified as connected, but a respondent may determine which NIGP code to use connected with the solicitation scope of work.

Question 6: Is the "scope of work" for each subcontracting opportunity the work category description? Are the "required qualifications" the work category minimum requirements?

Answer 6: On the Subcontracting Opportunity Notification Form, the Subcontracting Opportunity Scope of Work is the specific scope of work you will need the VetHUB firm to work on.

Also on the Subcontracting Opportunity Notification Form, the Required Qualifications will include all the Prime Provider will need from the VetHUB firm; including but not limited to, work category requirements, or otherwise as outlined in the request for proposal, etc.

Question 7: What are the "other contract requirements" that we must show in the email or notification form?

Answer 7: On the Subcontracting Opportunity Notification Form, for the Other Contract Requirements, this will include all the Prime Provider will need from the VetHUB firm; including but not limited to, task leader requirements if a task leader is needed, administrative qualification requirements, or otherwise as outlined in the request for proposal, etc.

Question 8: What is the process for a VetHUB to be assigned NIGP codes? I contacted several this last wave that were listed as having a particular NIGP code, and they responded back that they didn't perform that kind of work.

Answer 8: How NIGP Codes Are Assigned

Vendor Selection: When a business applies for certification or updates its profile through the Texas Comptroller, the owner selects the specific NIGP class and item codes that best describe their goods or services.

Maintenance Responsibility: Under 34 Texas Administrative Code, it is strictly the vendor's legal and administrative responsibility to ensure their profile accurately reflects what work they perform and to update codes as their business scope changes.

Why Mismatches Happen: Because the CPA relies on firms to select and update during application and renewal cycles, firms sometimes select overly broad codes or fail to remove outdated commodity codes, leading to situations where contacted firms disclaim the actual work.

Question 9: Please clarify. Am I required to solicit subcontracting opportunities from firms we have not previously worked with, and we don't know the quality of their work? If they accept, do we have to include them on the team?

Answer 9: You are not required to hire firms. However, you must provide a valid justification of why you are not adding them to the team.

Question 10: If there are no VetHUBs found in the table on 5.3, do we leave that blank, or should we state "No VetHUBs found"?

Answer 10: If you did not find any VetHUBs, you need to show proof that you did not find any.

Question 11: If we have several precertification codes that use the same NIGP code, can we combine those into a single line item and only notify/document once?

Answer 11: No.

Question 12: What's the best practice for documenting why we chose our selected subs?

Answer 12: To write a compliant justification for bypassing a VetHUB vendor, your statement must be completely factual, objective, and tied directly to the project's evaluation criteria. The best way to explain this is through a two-part framework: first state the objective requirement and then state how the VetHUB vendor did not meet it.

The Two-Part Justification Framework

- Part 1 (The Standard): State the specific, pre-determined requirement or baseline from your solicitation (e.g., price, specific experience, or capacity).
- Part 2 (The Gap): Clearly state how the VetHUB vendor's proposal fell short of that standard, backed by specific data points.

Examples of Best-Practice Justifications

Example 1: Capacity & Capability Mismatch

"The solicitation required a subcontractor with a minimum of three years of experience executing utility-scale electrical grid tie-ins. While VetHUB vendor [Company Name] is certified under the required NIGP code, their submitted proposal and past performance history confirm they only perform residential and light commercial wiring. They were not selected because they lack the specific technical capability required for this scope of work."

Example 2: Responsiveness & Project Schedule

"The project timeline requires mobilization on October 1, 2026, with all work completed by November 15, 2026. VetHUB vendor [Company Name] stated in their proposal that their earliest available mobilization date is November 1, 2026. They were not selected because their schedule availability fails to meet the mandatory project timeline."

- *Why it works:* It points to a clear, unalterable project constraint (time) that the vendor could not satisfy.

Key Rules to Remember

- Avoid Generalizations: Never use vague phrases like *"They weren't a good fit"* or *"We chose to go another direction."*
- Do Not Attack: Keep the tone neutral and professional. Treat the vendor's shortfall as a missing project requirement, not a business failure.

Question 13: CIV mentioned a "grace period" for the previous PEPS wave. What did that look like, and what was not given lenience?

Answer 13: The internal grace period does not mean a respondent can neglect or overlook the core procurement/VetHUB requirements that remain unchanged.

The grace period was strictly designed to handle unpredictable system shifts, not to excuse incomplete paperwork or multiple errors.

To ensure your submission remains compliant, keep the following rules in mind regarding compliance and communication:

Mandatory Disqualification for Omissions: If your submission is not signed, completely omits required forms or leaves mandatory sections of the subcontracting plan blank or incomplete, your proposal will be disqualified automatically. Agencies cannot use a grace period to bypass standard pass/fail administrative requirements.

Leniency via Clarification, Not Resubmission: An agency cannot allow you to redo or alter your submission after the deadline. However, they can reach out to seek clarification regarding specific, existing data points.

Some Correctable Scenarios: Communication from the agency is reserved for minor clerical nuances that can be resolved through simple verification rather than a total rewrite. For example, if you provided all the documentation for your subconsultant but made a clerical math error adding up the percentages, or if there is an ambiguity regarding a sub's active business name, the agency can reach out to clarify the discrepancy or wording in justification.

In short: Submit every piece of required documentation completely and on time. The grace period will protect you from system-level certification volatility, and communication can fix minor data clerical mistakes, but it will not save a submission from multiple deficiencies or requirements that remain unchanged.

Question 14: Can you review all of the documentation needed to be included with the subcontracting plan and how best to submit so we don't submit too much?

Answer 14: Yes. To prevent over-submitting and overwhelming the reviewers, page one of the subcontracting plan lists the name and contact information for the specific agency team member who can conduct a cursory, pre-submittal review of your subcontracting plan and supporting documentation. Leveraging this contact is the best way to ensure your packet contains exactly what is required, no more, no less. In addition, the Civil Rights Division is adding live Q&A sessions to assist providers with this process. The dates for these sessions will be published directly on the Civil Rights Division and PEPS website calendars, and it is strongly recommended that prime contractors attend.

These Q&A sessions will specifically cover:

- Understanding a Good Faith Effort (GFE)

- The structural "do's and don'ts" of compliant submissions
- How to search the Centralized Master Bidders List (CMBL) correctly to prevent disqualification
- The distinction between VetHUB certification and TxDOT/PEPS technical pre-certification/pre-qualification
- Drafting a valid justification for not selecting a VetHUB firm
- Managing and documenting the mandatory 7-day audit trail
- Reviewing required documentation boundaries
- Step-by-step guidance on how to fill out a subcontracting plan completely

By utilizing both the page one agency reviewer contact and attending these upcoming calendar sessions, you can confidently strip out unnecessary paperwork and submit a lean, fully compliant package.

Question 15: Where can we download “Figure 10 - VetHUB NIGP Work Category Table” showing the NGIP codes for all TxDOT Precertifications? This will allow firms to get to know VetHUB firms, mentor them and to encourage the VetHUB to get TxDOT precertification.

Answer 15: <https://www.txdot.gov/content/dam/docs/division/ppd/precert/hub-nigp-work-category-table.pdf>

Question 16: You have mentioned that VetHUBs on the Centralized Master Bidders List (CMBL) must be prequalified with PEPS to be considered. Are you stating that they need to have approved PEPS precertifications?

Answer 16: To be listed as a VetHUB firm, that firm must be a Texas certified VetHUB.

Other requirements mentioned in the request for proposal (RFP) must also be met as outlined in the RFP. RFP requirements don't negate the solicitation plan requirements.

If a Texas certified VetHUB firm is not Precertified or established to meet the minimum technical qualifications to perform work under a standard work category, or the VetHUB is not administratively qualified, the Prime Provider firm is required to notify the Texas certified VetHUB firm as outlined in the subcontracting plan. The Texas

certified VetHUB will need to confirm they do not meet what the Prime Provider firm needs. Reference the answer for question three for more information.

Resources

Texas Comptroller of Public Accounts

[Veteran Heroes United in Business \(VetHUB\)](#)

[VETHUB Forms](#)

[VETHUB Frequently Asked Questions](#)

Texas Department of Transportation

[Civil Rights Events Calendar - VetHUB Open Q&A Session](#)

[Historically Underutilized Business \(HUB\) Program](#)

[VetHUB\(HUB\) NIGP Work Category Table](#)

Contact Email Addresses

[TxDOT Civil Rights Division](#)

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