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What is the HUBZone program?

The HUBZone program is a business certification administered by the Small Business Administration (SBA). Its goal is to stimulate economic development and job creation in designated areas with low-income communities by promoting small businesses operating within those areas.

What kinds of companies are HUBZone certified?

HUBZone certified companies deliver all types of capabilities. Becoming a HUBZone certified company takes deliberate effort to achieve certification and ongoing compliance. HUBZone certified companies must be a small business according to SBA standards; 51% owned by US citizens, a Community Development Corporation, an agricultural cooperative, or an Indian tribe; have its principal office located in a HUBZone; and at least 35% of its employees reside in a HUBZone.

Can I sole-source a contract to a HUBZone certified company?

YES! Federal agencies may sole-source any requirement if less than \$5.5 million per contracting action.

How do I sole-source to a HUBZone certified company?

1. Talk to your contracting officer and let them know that you've identified a HUBZone company that is responsible, has reasonable pricing, and that you would like to **use Revolutionary FAR Overhaul (RFO) FAR 19.105-3**.
2. Your contracting officer will help **prepare a Justification and Approval (J&A) using RFO FAR 6.103-5(c)(1) using the statutory authority of 15 USC Chapter 14A § 657a(c)(2)(A)** that will document the due diligence performed for the award.
3. **There is nothing to send to the SBA** unlike what your contracting officer's team may be used to with the 8(a) program. NOTE: FAR 6.302-5 may appear in current J&A templates. The RFO has moved the "6.302-5 Authorized or required by statute" authority to FAR 6.103-5 (https://www.acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-6#FAR_6_103_5).

What about a requirement accepted into the 8(a) program and currently being performed by an 8(a) company?

1. The 8(a) program has been undergoing major changes since 2023 and more are expected in 2026.
2. On December 5, 2025, the SBA began an audit of firms participating the 8(a) program. (<https://www.sba.gov/article/2025/12/05/sba-orders-all-8a-participants-provide-financial-records>).
3. On December 8, 2025, the United States Senate Committee on Small Business & Entrepreneurship issued letters to 22 federal agencies requesting agencies examine sole-source and set-aside 8(a) contracts for violation of law, regulation, fraud, or improper activity; and inform the committee of the agency's intent to pause all 8(a) sole-source contracting before December 22, 2025 (<https://www.ernst.senate.gov/news/press-releases/ernst-calls-for-complete-halt-and-full-audit-of-fraud-filled-contracting-program>).
4. Finally, the **RFO FAR 19.108-11(a)(2) now permits any follow-on requirement in the 8(a) program to be set-aside under HUBZone** without requiring the contracting officer to get release approval from the SBA (https://www.acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-19#FAR_19_108_11).

How can I efficiently compete a requirement with HUBZone companies?

1. **Use the Federal Supply Schedule (i.e., "GSA MAS")**.
2. If the IGCE is less than the Simplified Acquisition Threshold (SAT) of \$350,000, then **RFO FAR 8.401(b) subpart 538.7103-2(a)(4) allows an RFQ to be issued to a minimum of just three contractors** (with the same GSA MAS SIN) and no J&A is required.
3. OR if the IGCE is greater than the SAT, RFO FAR 8.401(b) subpart 538.7103-2(a)(4) allows an RFQ to be issued to a minimum of just three contractors (with the same GSA MAS SIN) and then use **subpart 538.7103-2(c) allows a J&A in accordance with subpart 538.7104-3(b)(v) using the statutory authority of 15 USC Chapter 14A § 657a(c)(2)(A)**.

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