



<b>Title:</b>	AEP Procurement Policy (REV 003)	<b>Effective Date:</b>	July 1, 2013
<b>Owner:</b>	Brian Tierney, Chief Financial Officer	<b>Sponsoring Area(s):</b>	Supply Chain, Procurement & Fleet

**Policy/Purpose Statement:**

This Policy establishes the minimum requirements that a Business Unit shall follow for the Acquisition of Goods and/or Services. Additionally, it sets expectations for all Business Units within AEP having an influence on cost, quality, and delivery of Goods and/or Services.

**Detail:**

**1.0 Scope:** This Policy shall apply to the Acquisition of Goods and/or Services. The Policy governing Procurement of fuels, transportation, and related products is part of the Coal Procurement Policy and is administered separately. Acquisitions of Goods and/or Services for Joint Ventures shall be governed by the agreements, policies, and protocols established for each Joint Venture.

**2.0 Definitions:** Refer to Attachment A for the definition of any capitalized terms herein.

**3.0 Compliance:** The provisions set forth in this Policy shall be followed when acquiring any Goods and/or Services on behalf of AEP. Failure to comply with these provisions may result in disciplinary action up to and including termination. Any exceptions to this Policy shall be approved in writing by the owner of this Policy.

**4.0 Approval of Commitments:** All Contracts, Purchase Requisitions, lease agreements, Releases, and other agreements/expenditures that commit funds of the Company for the Acquisition of Goods and/or Services shall comply with the AEP Authorization Policy. The Authorization Policy can be found on the AEP Policy Central website.

**5.0 Sourcing and Selection:**

**5.1 Standards:**

**5.1.1 Acceptable Transaction Methods:** The Acquisition of Goods and/or Services will be requested through the use of the following methods. Every effort should be made to buy Goods through established AEP Catalogs (Asset Suite, Office Supplies, AEPGear.com, T&D WESCO Tool Catalog).

- Material Requests resulting in material issuances, transfers or Purchase Orders
- Purchase Requisitions resulting in Purchase Orders
- Contract Requisitions resulting in Contracts
- Other BU requests processed into Purchase Orders or Contracts
- Credit Card purchases in accordance with the AEP Corporate Credit Card Policy

**5.1.1.1 Exceptions to Acceptable Transaction Methods:** The list of exceptions is maintained on the SCPFO SharePoint site. New permanent exceptions can be requested by following the "New PO-Contract Exception Request" process.



**5.1.2 Required Use of Sourcing Professional:** Acquisition of Goods and/or Services with an estimated value over \$100,000 must utilize a designated Sourcing Professional as defined by this Policy. A Sourcing Professional may also be involved with an event less than \$100,000 as requested.

**5.1.3 Competitive Bidding Threshold:** Unless exempted under Section 5.1.4 of this Policy, any Acquisition of Goods and/or Services with an estimated value above \$100,000 shall be made through competitive bidding. For Acquisitions of Goods and/or Services below the \$100,000 threshold, the use of competitive bidding to Procure Goods and/or Services, regardless of the value, is strongly encouraged as a good business practice.

**5.1.4 Exceptions to Competitive Bidding:**

- Sole, Single Source and/or Other Than Low Bidder Awards for Goods and/or Services (in accordance with Section 5.1.5)
- Releases, Work Authorizations, or Purchase Orders issued against a Blanket Purchase Order, Blanket Contract or Blanket Service Agreement
- Exceptions listed under Section 5.1.1.1 of this Policy
- Software licenses for annual renewals associated with a Contract
- Legal service contracts written by AEP Legal Department

**5.1.5 Inclusion of Small Business/Diverse Suppliers in Bid Opportunities:** Unless exempted under Section 5.1.4 of this Policy, any Acquisition of Goods and/or Services with an estimated value above \$500,000 shall solicit a qualified minority, woman or veteran-owned supplier. For Acquisitions of Goods and/or Services below the \$500,000 threshold, the inclusion of a diverse supplier is strongly encouraged as a good business practice. (Refer to attachment D for diverse supplier classifications.)

**5.1.6 Sole, Single Source and Other Than Low Bidder Justification:** Prior to Award, any Sole Source, Single Source, or Other Than Low Bidder Acquisition of Goods and/or Services, with an actual or estimated value above \$100,000 shall have a Justification Statement reviewed by the appropriate Sourcing Professional (shown in the table below) and Business Unit approval at the next Authorization Level above the level having the dollar authorization to make the commitment.

**5.1.6.1 Procurement Review:** The level required for Procurement Review approval is outlined below:

Procurement Review	Range
Sourcing Professional	\$100,000 - \$1,000,000
Category Manager	\$1,000,000 - \$2,500,000
Director of Procurement	\$2,500,000 - \$5,000,000
CPO	➤ \$5,000,000

**5.1.5.2 Justification Statement:** As a minimum, the Justification Statement shall include, but not be limited to: 1) Business Unit; 2) description of the Goods and/or Services being acquired; 3) dollar value; 4) detailed description of why only this suggested source can furnish the requirements 5) signature of the individual(s) writing and approving the Justification Statement. A standard template that shall be used for a Justification Statement can be found as Attachment B to this Policy.



**5.1.7 Zero Dollar Blankets:** Blanket Contracts/Purchase Orders which provide no financial commitment, but establish a commercial relationship with a supplier, require the oversight and approval outlined below.

	<b>Competitively Bid</b>	<b>Sole/Single Sourced or Other Than Low Bidder</b>
<b>Procurement Review</b>		
\$100,000 - \$10,000,000	Category Manager	Director of Procurement
➤ \$10,000,000	Category Manager	CPO
<b>Business Unit Approval</b>	Vice President	Vice President

**5.1.8 Intentional Transaction Split:** Acquisition of Goods and/or Services shall not be split into multiple transactions with the same Supplier in order to avoid the requirements of competitive bidding.

**5.1.9 Competitive Affiliates:** Competitive bidding that includes a Competitive Affiliate must meet additional requirements contained in the state codes of conduct. The state codes of conduct can be found on AEP's Ethics & Compliance web site <http://ethics/codes/SourceDocuments/>.

**5.2 Methods and Form of Solicitations:**

**5.2.1 Methods of Solicitation:** Any Acquisition of Goods and/or Services valued above the Competitive Bidding Threshold defined in Section 5.1.3 shall utilize one or more of the formal methods of solicitation as defined in Attachment A and listed below:

- Request For Information (RFI)
- Request For Proposal (RFP)
- Request For Quote (RFQ)

**5.2.2 Solicitation Documentation:**

**5.2.2.1 Control Desk:** An RFP response (manual or electronic) must be strictly controlled through the formal establishment of a Control Desk in order to receive a bid or proposal from a Supplier. The electronic submission of a Supplier's response through a secure Electronic Sourcing Tool (EST) does not require the establishment of a Control Desk provided the EST functions in a method that prevents access to a response until the bid open date and time.

**5.3 Awards and Approvals:**

**5.3.1 Other Than Low Bidder:** Prior to an Award of a Contract that was competitively bid as part of Section 5.2.1 of this Policy, but that will not be awarded to the lowest price bidder, a Justification Statement must be reviewed by the appropriate Sourcing Professional (shown in the table 5.1.5.1) and must be approved by the Business Unit at the next Authorization Level above the level having the dollar authorization to make the commitment. In the case of a Zero Dollar Blanket, an Other Than Low Bidder Justification Statement must be written and approved by the individual listed in the "Competitively Bid" Column in Section 5.1.6.

**5.3.2 Evaluations/Analysis:** Evaluation and analysis of a Supplier's response shall be conducted in a fair and impartial manner and the Award made to the Lowest and Best Supplier responsive to the requirements described in the Rules Document.



- 5.3.3 Certificate of Award (COA):** A Certificate of Award shall be executed for any Acquisition that results in the Award of a Purchase Order/Contract to a Supplier for the purchase of Goods and/or Services above \$100,000.
- 5.3.4 Award Notifications:** All Suppliers participating in an RFP shall be formally notified (electronically or by letter) as to the status of an Award by the Sourcing Professional conducting the RFP.
- 5.3.5 Limited Notice To Proceed (LNTN):** All LNTN's, regardless of the value, shall be reviewed and approved by AEP Legal.
- 5.3.6 Verbal Agreements:** The Purchase Order/Contract constitutes the entire agreement between the parties and supersedes all previous and collateral agreements or understandings with respect of the subject matter of the Contract. No waiver, alteration, amendment or modification of any of the provisions of the Contract shall be binding unless in writing and signed by duly authorized representatives of the parties.

## **6.0 Contract Standards, Documents, & Modifications:**

### **6.1 Contract Standards:**

- 6.1.1 General:** Notwithstanding the use of a credit card in accordance with the AEP Credit Card Policy, any transaction that contains the provisions of an Offer, Acceptance, and Consideration shall utilize one or more Forms of the Contract Documents residing on AEP Legal's website: <http://legal/contractforms/> or in another Form acceptable to AEP Legal.
- 6.1.2 General Terms and Conditions:** Unless approved by AEP Legal, all Contracts shall reference AEP Terms and Conditions as the governing terms.
- 6.1.3 Legal Review of Contracts:** Any commitments that include changes to the various sets of AEP terms and conditions must be reviewed and approved by AEP Legal. Notwithstanding the provisions of the AEP Legal Contract Review Policy for Business Logistics/Supply Chain and Generation Business Services letter date September 28, 2005, all Contracts with a commitment value over \$500,000 shall be reviewed and approved as to Form by AEP Legal. Any Amendments that modify the General Terms and Conditions of a Contract or present a substantial modification in risk shall be reviewed and approved by AEP Legal. Notwithstanding the provisions of the AEP Legal Contract Review Policy for Business Logistics/Supply Chain and Generation Business Services letter dated September 28, 2005, all exceptions to AEP Terms and Conditions shall be approved by AEP Legal.
- 6.1.4 Releases against Blanket Contracts:** Refer to the Business Unit Contract Standards for guidelines as to whether a competitive bid is required or whether the existing blanket can be used for the order.

## **7.0 Documentation and Records Retention:**

- 7.1 Retention of Bid and Contract Files:** Bid documents and Contracts must be retained in accordance with AEP's Records Retention Manual which can be found on the following website: <http://dsapp2or/DATABASE/CORPSRVS/CSRRM00a.nsf?OpenDatabase>



## Review / Revision:

Every policy must be reviewed and certified as current on an annual or more frequent basis. The most current of those dates and the employee conducting it should be shown here, with that date added to the top of the first page and the footer of all pages. At the discretion of the owner, more detailed "Edit History" and/or "Approvals" areas may be maintained here, showing all activity on this policy over the specified time period.

### Reviewers/Approver:

Reviewed by: Rich Mueller, VP, Audit Services	04/15/13
Reviewed by: Craig Rhoades, VP Supply Chain, Procurement & Fleet	04/15/13
Approved by: Brian Tierney, Chief Financial Officer	06/05/13

### Revision History:

Revision 001, Paragraphs 5.1.1.1 and 5.1.6 – additions are highlighted	
Reviewed by: Rich Mueller, VP, Audit Services	10/01/13
Reviewed by: Craig Rhoades, VP Supply Chain, Procurement & Fleet	10/01/13
Approved by: Brian Tierney, Chief Financial Officer	12/12/13

Revision 002, Paragraphs 1.0, 3.0, 4.0, 5.0-5.3, 6.1.4	
Reviewed by: Procurement Policy and Procedures Team	01/25/16
Reviewed by: DVT	01/21/16
Reviewed by: SCPFO Steering Committee	03/08/16
Approved by: Brian Tierney, Chief Financial Officer	03/17/16

Revision 003, Paragraphs 5.1.1.1, 5.1.4-5.1.7, 5.3.6, Attachment C, Attachment D	
Reviewed by: Procurement Policy and Procedures Team	12/06/16
Reviewed by: DVT	12/08/16
Reviewed by: SCPFO Steering Committee	12/19/16
Approved by: Brian Tierney, Chief Financial Officer	02/07/17



## Attachment A Definitions

The following words, terms, and phrases defined in this attachment shall have the meanings set forth below whenever they appear in this Policy, except where:

- 1) the context in which they are used clearly requires a different meaning; or
- 2) a different definition is prescribed for a particular section or provision.

Words not defined shall be given the meaning provided under their common and ordinary meaning unless the context suggests otherwise.

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**Acceptance** – the decision by a Business Unit to agree to an Offer from a Supplier. One part of Contract formation

**Acquisition** - the taking of possession and control (in the form of title and ownership) of property from a third party

**Amendment** – any change or modification to the original Terms and Conditions of a Contract or other document

**Asset Suite** – the work management system used by AEP to record transactions associated with Contracts and Purchase Orders

**Authorization Level** – the specific dollar amount to which an individual may commit or legally bind AEP

**Award** – the formal Acceptance by the Business Unit of an Offer of Goods and/or Services made by a Supplier

**Blanket Contract** – A Contract that is funded for future Services, which is parceled as needed in the form of a Release

**Blanket Purchase Order** – A Purchase Order that is funded for future Goods, which is parceled as needed in the form of a Release

**Business Unit** – an entity within AEP having specific responsibilities and identified by a unique accounting string

**Catalog ID Items** – Goods that are assigned a unique numeric identifier in Asset Suite

**Category Manager** - a manager within Procurement responsible for a subset of Goods and/or Services who strives to improve Total Cost of Ownership and increase Internal Business Partner value by leveraging the total spend of the organization, proactively managing supplier relationships, rationalizing demand, streamlining the procurement process and focusing on the value drivers

**Competitive Affiliate** - an unregulated AEP affiliate whose business includes providing products in the open market

**Consideration** – something of value which is given by both parties in a Contract which induces the parties to enter into the subject agreement and to exchange mutual performance

**Control Desk** - the location to which bids/proposals are sent, logged, and kept under lock and key during an RFX that specifies requirements for sealed bids



**Contract** – the agreement detailing the specific terms of the Offer and Acceptance for the provision of Goods and/or Services between AEP and a Supplier in return for Consideration. Some examples of Contracts are Service Agreements, Standard Contracts or Blanket Contracts

**Contract Requisition** - the electronic document in AEP's Enterprise Asset Management tool whereby an individual initiates a request for a Contract

**DVT** – a team comprised of the Procurement Category Managers and other Procurement related support members that approves process and tool additions or changes. Team membership is maintained via the DVT email group

**Electronic Sourcing Tool (EST)** - a software tool utilized to collect profile information about potential suppliers and to conduct RFI and RFP bidding events

**Goods** – all tangible items

**Joint Venture** – an association of two or more companies engaged in a solitary business enterprise for profit without actual partnership or incorporation

**Justification Statement** – a document which clearly indicates the reason for not competitively bidding the Acquisition of a Good and/or Service or for not making an Award to the low bidder

**LNTP** – an instrument used to place a Supplier on notice to start a Service or deliver a Good prior to the execution of a Contract and is normally contingent upon successful negotiation of the terms and conditions

**Lowest and Best** – as applied to ranking of bids or proposals; lowest and best refers to the identification of a bid or proposal that provides the best outcome (without reference to cost) and then the ranking from lowest to highest price. The lowest and best is determined by the lowest price of those bids or proposals which are deemed to be responsive to providing the best solution

**Material Request** – the electronic document in AEP's Enterprise Asset Management tool whereby an individual initiates a request for Goods

**Offer** – a promise that, according to its terms, is contingent upon a particular act or promise given in exchange for the original promise

**Other Than Low Bid Acquisition** – selecting the supplier that is not the lowest commercially evaluated bidder for the Acquisition of a Good and/or Service

**Procurement** – the act of buying, purchasing, renting, or otherwise acquiring any Goods and/or Services for AEP. Procurement also includes all functions that pertain to the afore-stated, including, but not limited to: description of requirements, selection and solicitation of sources, preparation and Award of Contracts, and all phases of contract administration

**Proposal** – an Offer by a Supplier in response to an RFP invitation

**Purchase Order** - an Offer made to a Supplier through AEP's Enterprise Asset Management tool to purchase Goods from a Supplier contingent upon the Supplier meeting the terms included in the Offer

**Purchase Requisitions** – the electronic document in AEP's Enterprise Asset Management tool whereby an individual initiates a request for a Purchase Order

**Release(s)** – see Work Authorization. Release has a specific legal definition and for this Policy will only refer to the name given to the mechanism for issuing work against a Blanket Contract or Purchase Order in Asset Suite



**Rules Document** - the document provided with an RFx that provides the instructions for its completion and submission

**Request for Information (RFI)** - may be used to solicit information about a potential or existing Supplier's experience, service or product, capability, quality, and other information required to screen potential Suppliers prior to the formal process of requesting an RFP, RFQ, quote, or proposal

**Request for Proposal (RFP)** - shall be used to solicit an Offer from a Supplier when the scope, product, or work is not defined specifically enough, or when AEP is soliciting a solution to a product or Service requirement. This method will normally include the negotiation of both price and non-price factors for Award and shall be delineated in the Rules Document

**Request for Quote (RFQ)** - an RFQ may be utilized as an acceptable method to solicit and document a price for Goods and/or Services under the specific terms issued as part of a Contract or Service Agreement for Goods and/or Services resulting in a Work Authorization, Release, or Purchase Order as defined by this Policy

**RFx** – refers to any of the family of “Request For” documents, see RFI, RFP, RFQ

**Service Agreement** – the Form of Contract for Services that are generally low risk and up to \$500,000 in value. The Service Agreement is intended to be used with the Service Agreement Terms and Conditions

**Service** – any activity performed by a third party for the benefit of AEP, including, but not limited to labor, consulting, construction, training, maintenance and/or staff augmentation

**Single Source** - not competitively bidding the Acquisition of a Good and/or Service due to a business unit decision to select a specific supplier based on a technical, commercial or other valid business reason

**Sole Source** - not competitively bidding the Acquisition of a Good and/or Service due to a unique situation where there is only one supplier that offers that particular Good and/or Service

**Sourcing** – the act of identifying potential or existing Suppliers who are able to meet the form, fit, function, design or Service requirements identified in Contracts

**Sourcing Professional** – an individual within Procurement or Cook Procurement who possess specialized knowledge, skills, abilities, education, and experience to facilitate an RFx event

**Supplier** – one who provides Goods and/or Services

**Standard Contract** – the Form of Contract Services that are generally moderate or high risk and are over \$500,000 in value

**Work Authorization** - a specialized Contract Form, issued against a Blanket Contract, that authorizes a Supplier to perform Services and/or deliver Goods as described in its body or attached documents

**Zero Dollar Blankets** - Blanket Contracts or Blanket Purchase Orders which provide no financial commitment, but establish a commercial relationship with a Supplier





**® AEP PROCUREMENT POLICY ATTACHMENT B  
JUSTIFICATION FOR SOLE SOURCE, SINGLE SOURCE OR OTHER THAN LOW BID ACQUISITION**

I certify the statements enclosed and the information provided is complete and correct to the best of my knowledge. I understand that the processing of a justification form precludes the use of full and open competition in accordance with American Electric Power's Procurement Policy dated July 1, 2013. Section 5 requires that all purchases in excess of the Competitive Bid threshold of \$100,000 require competitive bidding unless justified by a Sole Source or Single Source Justification. I understand further that Awards to Other than Low Bidder must be similarly justified. Requisitioners are required to justify a Sole Source, Single Source or Other than Low Bid selection of a supplier in accordance with the instructions in the policy. This form must be completed and forwarded with the Contract and/or Purchase Requisition to proceed with the acquisition process.

**At a minimum, the Justification Statement shall include, but not be limited to: 1) Business Unit; 2) description of the Goods and/or Services being acquired; 3) dollar value; 4) detailed description of why only this suggested source can furnish the requirements 5) signature of the individual(s) writing and approving the Justification Statement.**

Purpose of Form: Sole Source  Single Source  Other than Low Bid Acquisition

The preliminary estimated dollar expenditure for this material, software and/or services is: \$ \_\_\_\_\_

Requisitioner:

Signature \_\_\_\_\_  
Name \_\_\_\_\_  
Title \_\_\_\_\_  
Date \_\_\_\_\_

**Item(s) or service(s):** (Description of Goods and/or Services)

**Suggested source/supplier:** (Supplier Name)

**Contract/PO number (if known):** (Contract No.)

**Describe in detail why only this suggested source can furnish the requirements to the exclusion of other sources.**

Approver:

Signature \_\_\_\_\_  
Name \_\_\_\_\_  
Title \_\_\_\_\_  
Date \_\_\_\_\_  
User ID \_\_\_\_\_

Procurement Review: \_\_\_\_\_ :

Initials \_\_\_\_\_  
Name \_\_\_\_\_  
Title \_\_\_\_\_



**AEP PROCUREMENT POLICY ATTACHMENT C  
PO/CONTRACT EXCEPTION FORM**

This form allows for an exception to the PO/Contract requirement in the Procurement Policy given the nature of the transaction. This form can also be used to request that a permanent exception to the Procurement Policy's PO/Contract requirement.

The preliminary estimated dollar expenditure for this material, software and/or services is: \$ \_\_\_\_\_

One time Exception (PO/Contract Pending)  Seeking Permanent Exception

**Explanation for Exception:** (must include date of purchase or service, reason a contract or purchase order was not obtained, and whether this transaction will be recurring)

Does vendor/contractor accept credit card payments? YES  NO

Requisitioner:

Signature \_\_\_\_\_  
Name \_\_\_\_\_  
Title \_\_\_\_\_  
Date \_\_\_\_\_

Business Unit Approval (Director, Plant Manager, or next level above):

Signature \_\_\_\_\_  
Name \_\_\_\_\_  
Title \_\_\_\_\_  
Date \_\_\_\_\_

**Suggested source/supplier:** (Supplier Name)

**Item(s) or service(s):** (Description of Goods and/or Services)

**Procurement Director Approval:**

- Corporate – Mannie Alvarez
- Generation – Brad Yoho
- Transmission – Judd Schumacher
- Distribution – Judd Schumacher

Signature \_\_\_\_\_  
Date \_\_\_\_\_ *Signature Required*

\*Completed form shall be submitted with invoice using the Online Payment Request Tool in PeopleSoft. Payment type of "DIR" shall be selected under "Special Options" of the Online Payment Request.



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## AEP PROCUREMENT POLICY ATTACHMENT D DIVERSE SUPPLIER CLASSIFICATIONS

Diverse Suppliers, in accordance with the guidelines set by the Small Business Administration, are defined below. The following words, terms and phrases defined in this attachment shall have the meanings set forth below when they appear in this Policy.

Words not defined shall be given the meaning provided under this common and ordinary meaning unless the context suggests otherwise.

**Small Business** – To qualify as a small business a business concern eligible for assistance from SBA as a small business is one that is organized for profit, with a place of business located in the United States. It must operate primarily within the United States or make a significant contribution to the U.S. economy through payment of taxes or use of American products, materials or labor. Together with its affiliates, it must meet the numerical size standards as defined in the Small Business Size Regulations 13 CFR 121.

**Minority-Owned** – A business that is at least 51% owned by, and whose management and daily business operations are controlled by, one or more members of a socially and economically disadvantaged minority group, namely US citizens who are African Americans (Black), Hispanic Americans, Native Americans, Asian-Pacific Americans and Indian sub-Continent Americans.

**Minority Business Enterprise (MBE)** – A business enterprise at least 51% owned by a minority individual or group, or in case of any publicly owned business, at least 51% of the stock of which is owned by one or more minority groups, and whose management and daily business operations are controlled by one or more of these individuals. American Electric Power shall presume that minority includes, but is not limited to Black Americans, Hispanic Americans, Asian Pacific Americans and other groups.

**Women Owned** – A business that is at least 51% owned by and whose management and daily business operations are controlled by one or more women who are U.S. citizens.

**Woman Business Enterprise (WBE)** – A business that is at least 51% owned by a woman; or, in the case of any publicly owned business, at least 51% of the stock of which is owned by one or more women, and whose management and daily business operations are controlled by one or more women.

**Woman-owned or Minority-owned Business Enterprise (WMBE)** - A woman-owned or minority-owned business enterprise; business that is at least 51% owned by a woman or minority; or, in the case of any publicly owned business, at least 51% of the stock of which is owned by one or more women or minority, and whose under these rules, the woman and/or minorities owning such an enterprise should be either U.S. citizens or legal aliens having permanent resident status in the United States.

**Veteran Owned (VET)** – A business that is at least 51% owned by one or more veterans, or in the case of any publicly owned business, not less than 51% of the stock of which is owned by one or more veterans; and the management and daily business operations of which are controlled by one or more veterans.

**Service Disabled Veteran Owned (SDV)** – Service Disabled Veteran a business that is a least 51% owned by one or more service-disabled veterans, or in the case of any publicly owned business, at least 51% of the stock of which is owned by one or more service disabled veterans; and the management and daily business operation of which are controlled by one or more service-disabled veterans, or in the case of a veteran with a permanent and severe disability, a spouse or permanent caregiver of such veteran.

**HUBZone (HUB)** - HubZones are small businesses located in "historically underutilized business zones", are owned or controlled by a U.S. Citizen, and at least 35% of its employees reside in a Hub zone.



**8a** – A program to assist eligible small disadvantaged businesses with business concerns compete in the American economy through business development.