

CA Training BECO: New Federal Requirements

11/6/2025



BECO LPA Team





DBE Interim Final Rule (IFR)

Effective October 3, 2025

Summary of Changes to Certification Standards



The presumption of social disadvantage is eliminated. This means that eligibility based on the race or gender of the owner(s) is removed.



Mandatory recertification is required for all DBE firms. This process, known as reevaluation, must be completed by the Arizona Unified Certification Program (AZUCP) partner agencies - ADOT, the City of Phoenix and the City of Tucson - as quickly as possible.



In order to apply for recertification, every firm must submit the following 2 documents - a current Personal Net Worth (PNW) Statement and a Personal Narrative (PN).



Re-Evaluation Guidelines

On October 31, 2025 the AZUCP issued a notification to all Arizona DBE certified firms regarding the mandatory reevaluation process. The reevaluation period will begin in early November, when a second notification will be sent providing specific instructions for submittal of the recertification application. The Personal Narrative (PN) will be a new requirement for most firms and we are developing additional guidelines to assist firms in understanding the required content.

Recertification
Personal Narrative Guidelines



More Information on the IFR



Interim Final Rule
October 3, 2025



IFR Guidance



DBE IFR FrequentlyAsked Questions



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As of October 3. 2025, these are the steps ADOT are taking to ensure compliance with the USDOT DBE IFR.

ADOT Will Not:

Set any DBE contract goals on ADOT or Subrecipient contracts.

Count any participation towards its overall DBE goal until the AZ UCP completes the reevaluation process.

ADOT Will:

Advertise, award, & administer all Federally-assisted contracts without DBE goals until the AZ UCP completes the reevaluation process.

Continue providing guidance and support to internal and external stakeholders.



DBE Interim Final Rulemaking (FR)

Until further guidance is received from USDOT, these are the steps ADOT are taking to conform to the direction of the IFR.

Contracts executed prior to October 3, 2025:

Continue to monitor for compliance the existing goals and contract language*

Contracts awarded prior to October 3, 2025 and not executed:

Continue with the execution of the awarded contract, and monitor for compliance with the existing goals and contract language*

Contracts open prior to October 3, 2025 and not awarded:

Continue with the award and execution of the contract to avoid construction delays and will seek guidance from FHWA regarding monitoring for compliance.



DBE Interim Final Rulemaking (FR)

Until further guidance is received from USDOT, these are the steps ADOT are taking to conform to the direction of the IFR.

Contracts advertised prior to October 3, 2025 and not open:

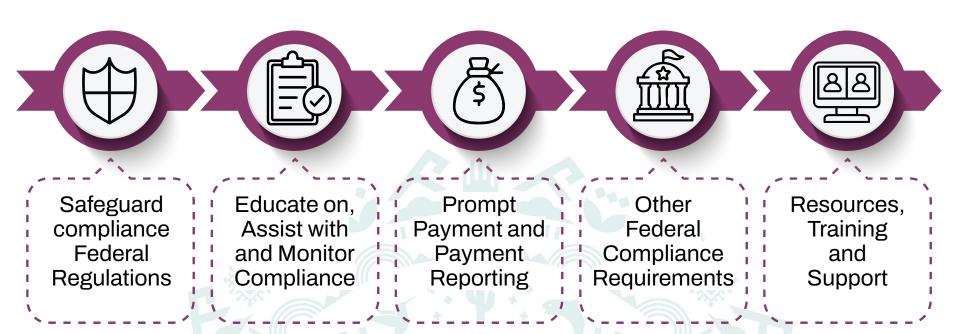
Issue an addendum or revision to remove the DBE goals and include Interim DBE without goal contract language

Future projects not advertised:

Include Interim DBE without goal contract language



BECO Compliance in Action





The Tech Team Supports:







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mpeterson2@azdot.gov Switch account



* Indicates required question

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