



Recertification/Personal Narrative Guidelines for DBE/ACDBE Applications

Dear small business partner,

The purpose of this letter is to provide guidance to all Disadvantaged Business Enterprise (DBE) and Airport Concessions Disadvantaged Business Enterprise (ACDBE) firms regarding the mandatory reevaluation for DBE certification under the new Interim Final Rule (IFR). The IFR was issued by the United States Department of Transportation (USDOT) on Oct. 3, 2025. ADOT, the City of Phoenix and the City of Tucson, as well as all certifying agencies across all states, are required to implement the rule immediately. You can review the rule and guidance at: [DBE Laws, Policy, and Guidance](#)

Please note the USDOT has opened a public comment period during which you can submit comments. The comment period is open through Nov. 3, 2025, and is linked here: [Federal Register](#)

This letter provides you with the resources to apply for recertification. Please review this document to understand the requirements for DBE recertification. Begin preparing your Personal Net Worth Statement and Personal Narrative(s) as soon as possible. The Arizona Unified Certification Program (AZUCP) agencies will email you regarding your application - be sure to respond by the date provided by your agency. The IFR changes to the DBE program are summarized below:

- 1) The presumption of social disadvantage is eliminated. This means that eligibility based on the race or gender of the owner(s) is removed.
- 2) 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.
- 3) 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)**.

When you receive an electronic notice from your certifying agency, you must submit your DBE recertification application-including the PNW statement and PN for the majority owner(s) by the stated due date. All applications for DBE recertification must be submitted within 30 days of the electronic notice, which will contain the exact due date.

Timely submission is essential to maintain your DBE certification. The Federal Regulation requires all DBE certifications to be temporarily suspended until the AZUCP completes the reevaluation process for DBE certified firms in Arizona. Please respond to this notice by the stated deadline. **Failure to respond by the stated deadline will result in the removal of your DBE Certification.**

Instructions to Apply for Recertification

**** Please wait for the electronic notification that the reapplication process will begin before you submit your application.****

1. Please fill out a PNW statement for the DBE owner or owners that hold 51% ownership of your firm. The form is linked here: [Personal Net Worth \(PNW\) Statement | US Department of Transportation](#).
2. You may also submit additional financial information that you feel is relevant.
3. Each owner representing 51% DBE ownership must submit a Personal Narrative (PN). This is a new document that the USDOT IFR requires. You can view the entire IFR at [DBE IFR Guidance](#)

Personal Narrative Guidelines

The PN is a new requirement that all DBEs must submit when applying for recertification. Prior to the USDOT IFR, women and minority-group owners were presumed to be socially disadvantaged, and there was also a provision for majority owners who were not members of these groups to demonstrate social disadvantage by providing a PN demonstrating that they had experienced social disadvantage. The new rule requires that all majority owners submit a PN that demonstrates social disadvantage.

The IFR provides guidance on information that should and should not be included in the PN.

- Social disadvantage **cannot** be based in whole or in part on race or sex.
- Social disadvantage must be based on each of the majority DBE owners on their own experiences and circumstances within American society.
 - Your birthplace in a particular country, on its own, does not necessarily demonstrate social disadvantage.
- PN must contain proof regarding **specific instances** you experienced related to:
 - Economic Hardship
 - Systemic Barriers
 - Denied Opportunities
 - Specific details are not listed as requirements, but could include dates, people, specific examples of opportunities not available to you specifically because of the social disadvantage you experienced.
- These instances must be **connected** to how they affected your success and progress in terms of:
 - Education
 - Employment
 - Business
 - This may include difficulty obtaining financing on terms available to non-disadvantaged persons in similar circumstances.
- Your PN must state how these instances **impeded** your progress, as well as the type of harm and the magnitude of **economic harm** the social disadvantage you experienced caused you.

There is no requirement that your PN be of any particular length. It must demonstrate disadvantage by a “preponderance of the evidence,” meaning it must show that the instances and impediments you describe were more likely than not the reason(s) for the social and economic harm you experienced. Listing a specific instance or instances of social disadvantage, what impediments you experienced and the harm you experienced are the key elements of a PN. It does not need to be long but it must contain at least one each of the three categories: instances, impediments and harm.

Remember, your eligibility can no longer be based on race or sex. You must provide instances of how you were denied access to education, capital or opportunity due to your social disadvantage without regard to race or sex.

If you choose not to apply for recertification, please notify your certifying agency. All firms wishing to be recertified must respond within the 30-day reevaluation period noted in your application notification.

We appreciate your participation in the DBE program and your patience during this transition.

Thank you,

ADOT Business Engagement and Compliance Office (BECO)
City of Tucson
City of Phoenix