

Reevaluation Application Guidelines

Dear small business partner,

This letter provides updated guidance for 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 2025 reevaluation application is now available in your agency's online portal. The AZUCP will wrap up the IFR reevaluation period for DBE/ACDBE firms on March 31, 2026. Recertification Applications submitted after this date will still be accepted and reviewed. Thank you to the firms that have already submitted their applications. We are reviewing submissions as quickly as practicable and are in the process of notifying firms once recertification eligibility decisions are determined. Firms that have not yet submitted a reevaluation application are encouraged to do so by March 31, 2026. If you have questions about the process or do not plan to apply for recertification, please notify your certifying agency. Please note that recertification under the IFR eligibility standards is required for a firm's participation to be eligible for DBE credit.

ADOT, the City of Phoenix and the City of Tucson, as well as all certifying agencies nationwide, are required to implement this rule immediately under the IFR issued by the United States Department of Transportation (USDOT) on October 3, 2025. You may review the rule and guidance at: [DBE Laws, Policy, and Guidance](#).

Key changes under the new USDOT rule include:

1. The presumption of social disadvantage has been removed. Eligibility will no longer be based on an owner's race or sex.
2. All DBE firms must complete mandatory recertification, known as reevaluation, through the Arizona Unified Certification Program (AZUCP). You will submit your reevaluation application to the agency that manages your DBE certification records - ADOT, the City of Phoenix and the City of Tucson.
3. Each firm must submit two required documents: a current **Personal Net Worth (PNW) Statement** and a **Personal Narrative (PN)**.

Instructions to Submit the 2025 Reevaluation Application

Log in to your account as usual and select "2025 Reevaluation Application."

Please ensure the following:



Note: Federal business tax return is not required but may be used.

Guidance on Developing an Effective Personal Narrative (PN)

Each owner that is part of the 51% DBE ownership of your firm must submit a Personal Narrative (PN) that clearly shows personal disadvantage through specific examples. These may include economic hardship, barriers, or denied opportunities that affected your education, employment, or business, such as difficulty obtaining financing on terms offered to similarly situated, non-disadvantaged individuals.

In addition, your PN must connect the following three elements: **Instances <> impediments <> harm**

Your PN must describe at least one instance where you experienced disadvantage, the impediment it created and the harm that resulted. The PN does not need to be long, but it must clearly include all three elements.

For example, attending a school with limited resources may have restricted access to training or enrichment programs. This could have impeded your education and caused harm, such as not being accepted into a program in your chosen field or missing internships that help launch a career.

Your PN should tell your story in an evidence-based way. Evidence may include denial letters from schools, banks or employers. It may also be your own recollection of events, including when and where the situation occurred. If documents are not available, providing clear context can still support your narrative.

Your PN should connect your personal experiences to real impacts on your business journey. This may include taking longer to complete your education because you had to work long hours, resulting in slower business growth, higher borrowing costs or limited access to resources. You must also explain the harm that resulted, such as missed contracts, reduced income, missed opportunities or lack of access to professional networks typically available to larger firms.

Showing how your instances of disadvantage created impediments and harm helps demonstrate how systemic challenges have affected your business path. When reviewed with your Personal Net Worth statement, your PN provides the information needed to determine eligibility.

Reminders

- Your Personal Narrative (PN) does not need to be a specific length. It must show disadvantage by a “preponderance of the evidence,” meaning the situations you describe were more likely than not the cause of the social or economic harm you experienced. Eligibility can no longer be based on race or sex.
- If you choose not to apply for recertification, please notify your certifying agency.
- **All firms seeking recertification must respond as quickly as possible. Firms that do not submit their application may be decertified.**

Thank you for your participation in the DBE program and for your patience during this transition,
ADOT Business Engagement and Compliance Office (BECO)
City of Tucson (COT)
City of Phoenix (COP)