



From Policy to Practice

Understanding the USDOT IFR
and what this means for your business



March 12, 2026

ADOT'S NONDISCRIMINATION NOTICE TO THE PUBLIC

The Arizona Department of Transportation (ADOT) hereby gives public notice that it is the Agency's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, Title II of the Americans with Disabilities Act of 1990 (ADA), and other related authorities in all of its programs and activities.

ADOT's Title VI and ADA Programs require that no person shall, on the grounds of race, color, national origin, or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

Any person, who believes his/her Title VI or ADA rights have been violated, may file a complaint. Any such complaint must be in writing and filed with the ADOT External Civil Rights within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For additional information about ADOT's External Civil Rights programs and the procedures to file a complaint contact ADOT External Civil Rights via the information listed below:

ADOT External Civil Rights
1801 W. Jefferson St., Phoenix, AZ 85007
PHONE: 602.712.8946
EMAIL: CivilRightsOffice@azdot.gov

Danielle Valentine
Title VI Coordinator
EMAIL: DValentine@azdot.gov

Krystal Smith
ADA/504 Coordinator
EMAIL: KSmith2@azdot.gov

AVISO PÚBLICO DE LA LEY DE NO-DISCRIMINACIÓN DE ADOT

El Departamento de Transporte del Estado de Arizona (ADOT) informa al público que la agencia tiene como regla asegurar el cumplimiento de el Título VI de la Ley de los Derechos Civiles de 1964, del Título II de la Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA) y otras normas relacionadas con todos sus programas y actividades.

Los programas del Título VI y ADA de ADOT exigen que a ninguna persona se le excluya de participar, se le nieguen beneficios o de ninguna otra manera sea sujeta a discriminación en ningún programa o actividad de ADOT por motivo de raza, color, país de origen, o discapacidad.

Cualquier persona que crea que se han violado sus derechos bajo el Título VI o el ADA, puede presentar una queja. Esta queja debe presentarse por escrito a la Oficina de Derechos Civiles de ADOT dentro de ciento ochenta (180) días a partir de la fecha en que se alega que ocurrió la discriminación. Para recibir más información sobre los programas de Derechos Civiles de ADOT y los procedimientos para presentar una queja, por favor póngase en contacto con la Oficina de Derechos Civiles de ADOT con la información que aparece abajo:

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AUXILIARY AIDS AND SERVICES

In compliance with Title II of the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act of 1973, the Arizona Department of Transportation (ADOT) does not discriminate against qualified individuals with disabilities on the basis of disability in its programs, services, and activities.

ADOT will make reasonable accommodations to ensure that individuals with disabilities have an equal opportunity to enjoy ADOT's programs, services, and activities.

If you require an accommodation please notify an ADOT staff member.

For additional information or questions about ADOT's External ADA Program, please contact the External Civil Rights Programs at 602.712.8946.

SERVICIOS Y ASISTENCIA ADICIONAL

En cumplimiento con el Título II de la ley de ciudadanos Americanos con Discapacidades (ADA por sus siglas en inglés) y la Sección 504 de la Ley de Rehabilitación de 1973, el Departamento de Transporte del estado de Arizona no discrimina contra individuos con discapacidades en sus programas, servicios y actividades administrados por el departamento.

ADOT hará adaptaciones razonables para asegurar que individuos con discapacidades tengan las mismas oportunidades de disfrutar y participar en todos los programas, servicios y actividades de ADOT.

Las personas que requieran asistencia o una adaptación razonable por discapacidad por favor informe a un empleado de ADOT.

Si tiene cualquier pregunta o desea más información sobre el programa de no discriminación de ADOT, por favor póngase en contacto con la Oficina de Derechos Civiles de ADOT al 602.712.8946.

Anonymous Self-ID/Identificarse Anónimo

By completing this voluntary survey, ADOT will be able to determine who attends its public meetings and how the department can improve participation. The survey will also help ADOT fulfill federal reporting requirements.

<https://forms.gle/QaKDtZuAw172aKeU8> [use the links to your survey]

Con su participación en esta encuesta voluntaria, ADOT podrá determinar quien participa en las reuniones públicas y como podrá mejorar la participación de miembros de minorías. La encuesta también le ayudará a ADOT a cumplir con requisitos federales.

<https://forms.gle/oHCUi1exHx15r8Ls8>

Small Business & Workforce Development (SBWD)

Continued Support to Small Businesses



1:1 Support & Engagement

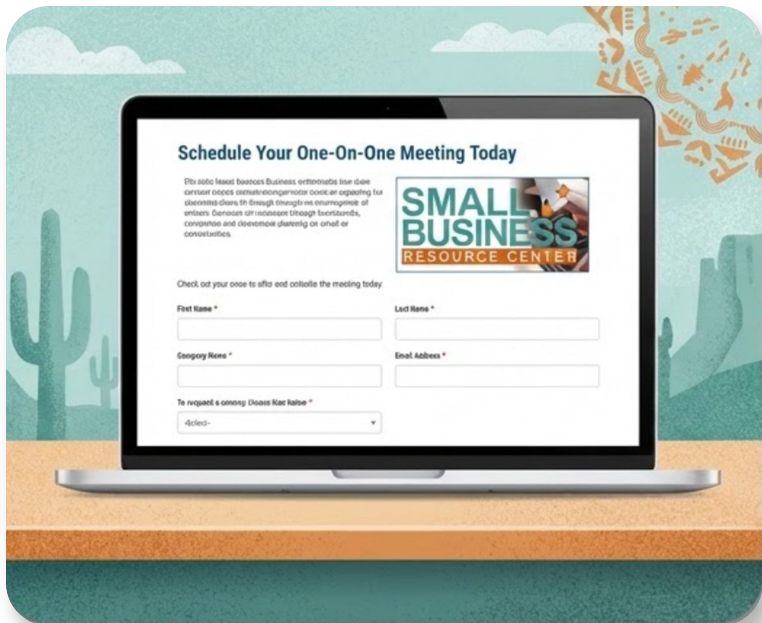
1:1 Support & Engagement 1:1 support for internal/external stakeholder engagement, as well as ongoing outreach, industry networking/educational events (like the EXPO).



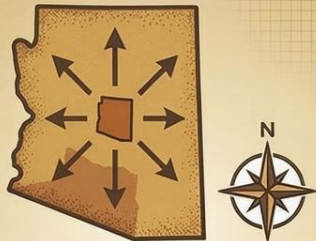
Communications & Planning

Weekly/monthly communications will continue as usual while keeping the IFR requirements, updates and topics top of mind in our planning efforts.

Small Business Support & Resources



Arizona Unified Certification Program (AZUCP)



ADOT

All firms located outside of Maricopa and Pima Counties, including interstate applicants.



City of Phoenix

All firms located in Maricopa County, AZ and any firm seeking certification in airport concessions as an ACDBE.



Tucson

All firms located in Pima County, AZ.


USDOT IFR Timeline of Communications



US DOT Interim Final Rule (IFR)

Effective October 3, 2025

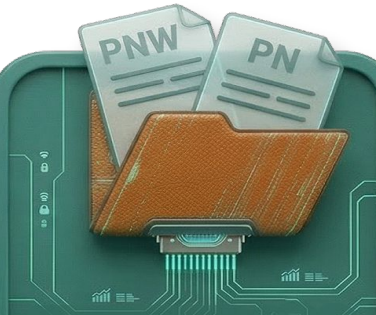
Summary of Changes to Certification Standards



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



Mandatory reevaluation is required for all DBE firms and must be completed by the Arizona Unified Certification Program (AZUCP) partner agencies, ADOT, City of Phoenix and City of Tucson



Every DBE firm must submit:

1. Personal Net Worth (PNW)
2. Personal Narrative (PN)

DBE Interim Final Rule (IFR)

Effective October 3, 2025

Impact to DBEs (current or potential)

1

Each owner must complete a **current Personal Net Worth (PNW)** statement.



2

Each owner with **at least 51% DBE ownership** must submit an individual Personal Narrative (PN).

PN describing experiences of social and economic disadvantage in education, employment, or business.

THESE CREDENTIALS
ARE NON-RENEWABLE
AND MUST BE
RENEWED BY
THE STATE OF
ARIZONA
ON 10/03/25

3

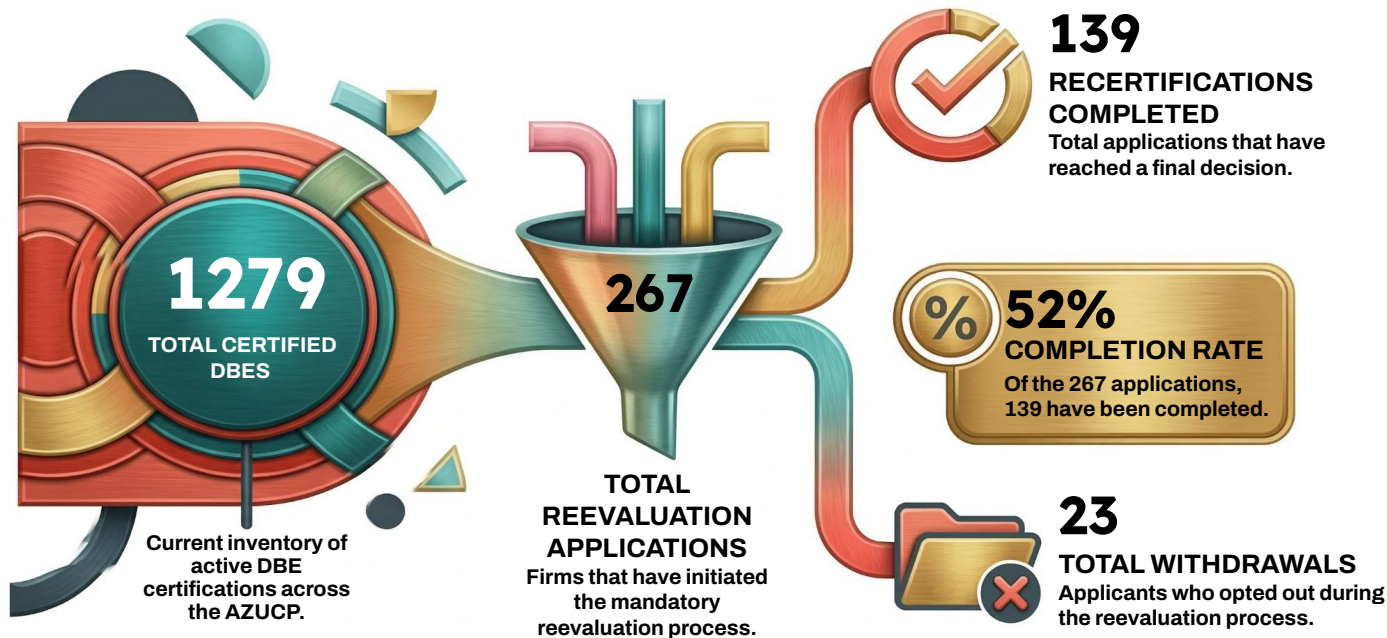
You may upload any additional financial documents you believe support your application in the "Additional Documents" section.



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

DBE Interim Final Rule (IFR)

Current State of Reevaluation



DBE IFR

Next steps the AZUCP will be taking
once the Reevaluation Process is complete:



Notify
USDOT
that the
reevaluation
is complete



The AZUCP
Directory &
agreement will be
updated to reflect
the new IFR
eligibility standards



Resume
accepting **new**
DBE applications
once updated
USDOT forms are
available



Ensure access
to resources,
training and
ongoing
support

DBE Interim Final Rule (IFR)

Steps ADOT is taking to conform to the Direction of the IFR

ADOT Will Not:

Set any DBE contract goals on ADOT or Subrecipient contracts

01

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

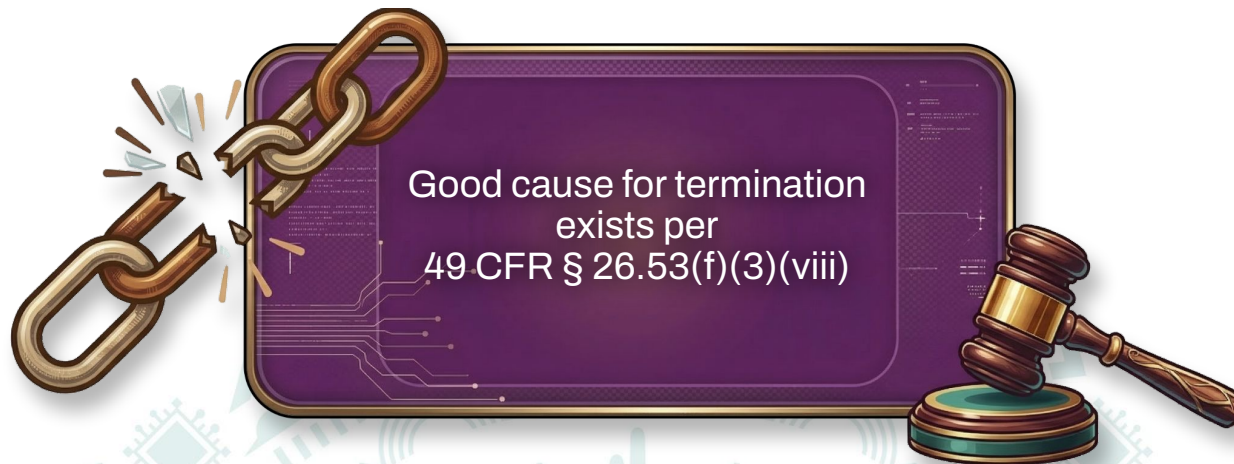
ADOT Will:

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 Rule (IFR)

Potential impacts to DBEs
who do not complete reevaluation process or withdraw*:



***In accordance with updated USDOT IFR and FAQ released December 1, 2025**

Commitment to Federal Requirements



ADOT IFR Reevaluation Communications

DBE Interim Final Rule (IFR) information

Home / Business / Business Engagement And Compliance Office (BECO) / DBE Interim Final Rule (IFR) Information

DBE Interim Final Rule (IFR) information

Notices from ADOT regarding USDOT DBE Interim Final Rule (IFR):

- 1 [IFR Implementation BECO Communication](#) - Oct. 16, 2025
- 2 [Follow up Guidance BECO Communication](#) - Nov. 21, 2025
- 3 [AZUCP Reevaluation Application Guidelines for DBE/ACDBE's in Arizona](#) - updated December 2025
- 4 [Notice to All DBE/ACDBE Firms](#) - Jan. 6, 2026
- 5 [AZUCP Reevaluation Application Guidelines for DBE/ACDBE's in Arizona \(Updated Feb. 2026\)](#) - Feb. 17, 2026

Please reach out if you have any questions via the [Questions Related to the Interim Final Rule \(IFR\)](#) google form.

Questions Related to the Interim Final Rule (IFR)

This form is intended to collect questions related to the DBE/ACDBE reevaluation process, Contracting requirements, and any firms seeking new DBE/ACDBE Certification in accordance with the [Interim Final Rule \(IFR\)](#) effective on October 3, 2025.

[IFR FAQ-Updated 12-1-2025](#)

Before submitting:

- Please submit your question(s) under the section to which they apply.
- If submitting more than one question within a section, list each question separately using bullet points or numbered system.

Submitted questions will be routed to the appropriate team for response.

* Indicates required question

Email *

Your email

General IFR Questions

Your answer

Contracting Questions



