# Action Required: Reevaluation Application Submission

Dear Small Business Partner,

This letter serves as notice to DBE and Airport Concessions Disadvantaged Business Enterprise (ACDBE) firms previously certified under 49 CFR Parts 26 and 23. We are providing updated guidance to all Disadvantaged Business Enterprise (DBE) and DBE/ACDBE firms regarding the mandatory reevaluation for DBE firms under the new Interim Final Rule (IFR).

Firms may continue to submit reevaluation applications at this time. **However, if your company does not submit a reevaluation application by June 30, 2026 you will need to submit a new DBE application**. This will allow us to resume accepting applications from new applicants to support Arizona's small and disadvantaged business community, and resume other elements of the DBE program such as counting participation.

The 2025 reevaluation application is currently available in your agency's online portal. Thank you to the firms that have already submitted their reevaluation applications. We are reviewing submissions as quickly as practicable and are in the process of notifying firms once reevaluation eligibility decisions are determined. Firms that have not yet submitted a reevaluation application are encouraged to do so no later than **June 30, 2026**. Firms that have not submitted a reevaluation application by June 30, 2026 will be delisted from the DBE Directory and deemed ineligible for participation in the DBE program. Your firm will remain listed as a Small Business Concern.

If you have questions about the process or do not plan to apply for reevaluation, please notify your certifying agency. For a firm's participation to be eligible for DBE credit, the firm must complete the reevaluation under the IFR eligibility standards. You may review the rule and guidance at: DBE Laws, Policy, and Guidance.

## Instructions to Submit Reevaluation Application

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

Please ensure the following:

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).
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.***

## 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 reevaluation, please notify your certifying agency.
- **All firms seeking reevaluation must respond by June 30, 2026. Firms that do not submit their application may be disqualified.**

Thank you for your participation in the DBE program and for your patience during this transition.

Arizona Department of Transportation (ADOT)
City of Tucson (COT)
City of Phoenix (COP)