



Frequently Asked Questions (FAQs)

NJ UCP DBE Reevaluation Application Process based on January 23, 2026 Webinar

Effective October 3, 2025, the U.S. Department of Transportation (USDOT) issued an Interim Final Rule (IFR) that revised DBE and ACDBE certification standards set forth in Parts 23 and 26 of Title 49 of the Code of Federal Regulations. The Port Authority of New York and New Jersey provides these FAQs to better support DBE and ACDBE certified firms during the reevaluation process. **All questions and answers below also apply to ACDBE certified firms as well.**

Frequently used terms/acronyms

ACDBE	Airport Concession Disadvantaged Business Enterprise
CFR	Code of Federal Regulations
DBE	Disadvantaged Business Enterprise
DOE	USDOT Declaration of Eligibility
FOIA	Freedom of Information Act
IFR	Interim Final Rule issued by USDOT on October 3, 2026
JOC	Jurisdiction of Original Certification/Home State
NJ UCP	New Jersey Unified Certification Program which includes three certifying agencies/certifiers (The New Jersey Department of Transportation, New Jersey Transit and The Port Authority of New York and New Jersey)
PN	Personal Narrative
PNW	Personal Net Worth Statement
SEDO	Socially and Economically Disadvantaged Owner (SEDO)
USDOT	United States Department of Transportation

Links: [USDOT FAQs](#) and [IFR](#)

GENERAL QUESTIONS

- 1. For firms with an active DBE or ACDBE certification, including those recently certified or approaching a renewal date, how should firms handle their annual certification renewal application while a reevaluation decision is pending?**

Annual updates (Declaration of Eligibility - DOE) will be processed once the reevaluation process is complete. Existing certified firms participating in the reevaluation process will be notified regarding the status of their certification and the next steps.



2. (a) Does a disadvantaged individual holding a minority ownership interest qualify the entire firm for DBE or ACDBE certification? (b) Is there a percentage ownership threshold that an owner(s) claiming social and economic disadvantage owner (SEDO) status must meet to qualify for DBE or ACDBE certification?

(a) No. A disadvantaged individual holding minority ownership does not qualify the entire firm for DBE or ACDBE certification.

(b) Pursuant to 49 CFR part 26.69(a), a SEDO must own at least 51 percent of each class of ownership of the firm. Each SEDO whose ownership is necessary to the firm's eligibility must demonstrate that their ownership satisfies the ownership requirements of 49 CFR 26.69. If not, the firm is ineligible.

3. If a firm chooses not to participate in the re-evaluation process, how will that firm be reflected in the DBE or ACDBE directory (e.g., decertified or removed)?

If a firm chooses not to participate in the reevaluation process, they will be removed from the public directory. However, please see Question #6 below.

4. If a firm has already submitted a Personal Narrative (PN) or Personal Net Worth statement (PNW) that is incomplete or submitted on incorrect forms, will the certifying agency request additional information or deny the application?

The certifying agency will request clarification on the Personal Narrative and corrections to the Personal Net Worth Statement if they are needed.

5. (a) What is the expected timeframe for reviewing Personal Net Worth statements and Personal Narratives? (b) How long does the certifying agency have to complete the reevaluation process and (c) will applications be evaluated individually as they are submitted, or in a single review period after all submissions are received?

(a) The time frame to complete the review is contingent on several factors including but not limited to the volume of documents received, whether clarification of the PN is required, and whether corrections to the PNW are required. (b) Per the IFR, each state's Unified Certification Program (UCP), which can be made up of more than one certifying agency, is to complete the process as quickly as practicable. (c) Applications are evaluated individually as they are submitted.



6. Will firms be able to submit PN and PNW after February 12, 2026?

Yes, firms may submit personal narratives and personal net worth statements after February 12, 2026. Currently certified DBEs or ACDBEs that do not submit the required information by the UCP's submission date may still submit the required documentation at a later time.

However, such firms will remain ineligible for counting toward DBE or ACDBE participation until they submit the required documentation demonstrating DBE or ACDBE eligibility under the new standards and obtain certification.

7. Is a PNW statement subject to FOIA requests?

A PNW is **not** subject to FOIA. Refer to the regulations below:

Pursuant to 49 CFR Part 26.68(e), "Notwithstanding any provision of Federal or State law, **a certifier must not release an individual's PNW statement nor any documents pertaining to it to any third party without the written consent of the submitter.** Provided that [the certifier] must transmit this information to [US]DOT in any certification appeal proceeding under § 26.89 or to any other State to which the individual's firm has applied for certification under § 26.85."

Pursuant to 49 CFR Part 26.109 (a),

(1) "In responding to requests for information concerning any aspect of the DBE program, the [USDOT] complies with provisions of the Federal Freedom of Information and Privacy Acts (5 U.S.C. 552 and 552a). [USDOT] may make available to the public any information concerning the DBE program release of which is not prohibited by Federal law."

(2) "Notwithstanding any provision of Federal or State law, **[the recipient/certifying agency] must not release any information that may reasonably be construed as confidential business information to any third party without the written consent of the firm that submitted the information.** This includes applications for DBE certification and supporting information. However, [the recipient/certifying agency] must transmit this information to [US]DOT in any certification appeal proceeding under § 26.89 of this part or to any other state to which the individual's firm has applied for certification under § 26.85 of this part."

8. Can we submit our PNW first and then our PN?

No. A complete package must be submitted for review.



9. What is the firm's gross sales per year that qualify as DBE or ACDBE?

A firm's gross sales is not required for the re-evaluation process.

DBE: A firm's previous Federal business tax gross receipt over the past three fiscal years cannot exceed \$31.84M for DBE eligibility. Additionally, a firm's average five-year business size must not exceed assigned NAICS codes as defined in 13 CFR 121.104(a).

ACDBE: Refer to 49 CFR part 23.33 for ACDBE size standards.

10. How many owners of a firm are required to submit a Personal Narrative, Personal Net Worth Statement, and supporting documentation for the reevaluation application?

Each owner claiming SEDO (Socially and Economically Disadvantaged Owner) status is required to submit a Personal Narrative, Personal Net Worth Statement, and any other supporting financial documents. See also Question #2 above.

PERSONAL NET WORTH

11. Are the owner's retirement accounts included in the main asset calculation on the Personal Net Worth form?

No. Owner's retirement accounts are not included in the asset calculation. However, the owner is required to list their retirements accounts on the itemized WORKSHEET #13 on page 9 of 9 of Personal Net Worth Form.

12. Are the values of primary business included in the PNW asset calculation breakdown?

No. The value of the primary business is not included in the asset calculation on the PNW form.

13. What is the Personal Net Worth threshold?

The threshold for Personal Net Worth is \$2,047,000.

14. Is an owner required to resubmit a new PNW if a form was previously submitted prior to the IFR effective October 3, 2025?

Yes. An owner must provide an updated PNW with their reevaluation application.



15. Is the fair market value of an owner's primary residence included in the PNW calculation?

No. The present market value of the owner's primary residence is not included in the main asset calculation on the PNW form. The primary residence information is only itemized on WORKSHEET #14 on the PNW form.

16. Are property and mortgage values related to the primary business included in the PNW calculation?

No. Property and mortgage values related to the primary business are not included in the PNW calculation.

17. Are jointly owned assets with their spouse included in the owner's PNW calculation?

No. Only the owner's share of the jointly owned assets is included in the owner's PNW calculation. The spouse's share is not included.

18. Does the life insurance trust have any impact on the PNW amount?

An owner must enter only the cash surrender value of their life insurance account(s) on the asset calculation of the PNW form.

19. Is the SEDO's primary business account information included in the PNW?

No. Only the owner's personal bank account and money are reported in the asset calculation on the PNW form. Bank accounts associated with the primary business are not included in the asset calculation.

20. Will an updated Personal Net Worth form be sent to us or use the current one?

A blank PNW form, which was **revised in May 2024**, is available to download from the B2Gnow 2025 Reevaluation application module section. Owners are expected to provide an updated PNW related to their current financial situation. Attached is the hyperlink to the [Personal Net Worth Statement](#).

21. If the SEDO cosigned or is personally responsible for a business loan by the company (primary business), should that responsibility be considered when listing personal liabilities?

No. Do not include loans related to your primary business.



22. When documenting assets such as art and collection, do we submit the proof of value?

Asset amounts disclosed on PNW calculation related to art or collections should be listed with their respective fair market values and supported by documentation.

23. For owners with shares in another company, how can the values be calculated? Is it calculated based on total revenue, based on the owner distributions, or based on equity of the profit statement?

Enter the value of the owner's distribution in other business investments (excluding the applicant firm/primary business).

24. How current does the PNW statement need to be? As of "date"?

The "As of Date" reflects the date the form is completed and submitted.

PERSONAL NARRATIVE

25. (a) Can you please explain what a Personal Narrative is, and what does a Personal Narrative consist of? (b) Are there examples of what a Personal Narrative might look like?

(a) A personal narrative identifies and describes **at least one specific instance** of economic hardship, systemic barriers, and/or denied opportunities. It shows how those circumstances impeded the owner's progress or success in education, employment, or business, and the resulting economic harm in both type and magnitude.

(b) No. Personal narratives are an individualized statement of disadvantage. Every personal narrative will be case by case and there is no one size fits all standard.

26. What would be a proper format for the Personal Narrative in terms of type and length?

There is no specific format, type, or length for the personal narrative.

27. (a) Does the Personal Narrative require one instance of Economic Hardship, one instance of a Systemic Barrier, and one instance of Denied Opportunity, or would one instance alone be sufficient in addressing instances of disadvantage? (b) Must all instances of disadvantage lead to an economic impact?

- (a) An owner does not have to show instances of disadvantage in all categories. However, an owner must identify **at least one instance** of economic hardship, systemic barrier, or denied opportunity.
- (b) There must be a causal relationship between the instance of disadvantage, how it impeded progress or success in education, employment, or business, and the resulting economic harm in both type and magnitude.

28. What types of supporting documentation must accompany a Personal Narrative? When providing “Proof” related to the story we are telling, would a “Denied Loan Letter” or the like be sufficient?

An applicant may submit any document(s) that would support their claim of social and economic disadvantage.

29. After DBE or ACDBE approval, would a Personal Narrative be required to be submitted every year by the firm?

After approval, firms must confirm there are no changes in ownership during their certification period and annual update/renewal. A revised PN and PNW may be required if there are changes in SEDOs.

30. (a) How would my DBE or ACDBE reevaluation application be treated if “race” is referenced as a qualifying factor within the Personal Narrative in terms of life experience and not presumption? (b) Would the DBE or ACDBE reevaluation application be rejected?

- (a) All applicants must demonstrate social and economic disadvantage based on their own experiences and circumstances within American society, and must not rely, in whole or in part, on race or sex.
- (b) If a personal narrative relies on race or sex as a qualifying disadvantage, the certifying agency will request a resubmission that does not rely on race or sex.

31. (a) Do the experiences expressed within the Personal Narrative have to relate to the SEDO's firm (primary business) experiences or incidents occurring in the past? (b) Should specific individuals or organizations be named in incidents of disadvantage?

(a) A SEDO may use any instance of disadvantage from any point in their life within American society.

(b) The SEDO is encouraged to provide as much detail as possible to demonstrate the disadvantage experienced, how it impeded progress or success in business, education or employment and how that led to economic harm in type and magnitude.

32. Understanding that the new re-evaluation of DBE and ACDBE applications eliminated the presumption of race or sex when considering social and economic disadvantage, may an owner reference language barriers as qualifying factors for demonstrating social and/or economic disadvantage?

Yes. Applicants may reference barriers, such as language, in demonstrating social and economic disadvantages. However, social and economic disadvantage must be based on the applicant's own experiences and circumstances within American society, must not rely, in whole or in part, on race or sex.

33. What constitutes a social disadvantage? Are there any examples? Can a physical handicap/disability qualify as an instance of social disadvantage if it is supported by proof?

Yes, physical or mental disability may be used as an example of social and economic disadvantages. However, there must be a causal link between the instance of disadvantage, how it impeded progress or success in business and the resulting economic harm in both type and magnitude.

INTERSTATE CERTIFICATION

34. Once a firm is reevaluated and recertified in their home state, will we need to submit the Personal Narrative and Personal Net Worth to other states that we are a DBE in?

No. Once a firm is reevaluated and recertified in their home state/Jurisdiction of Original Certification (JOC), they are not required to submit the Personal Narrative and Personal Net Worth to be reevaluated by other agencies. However, they must follow the Interstate process in 49 CFR Part 26.85(c) providing all documentation (including revised U.S.D.O.T. Declaration of Eligibility - DOE) when submitting to other agencies.