



Frequently Asked Questions (FAQs)

**NYS UCP DBE and ACDBE Reevaluation based on
January 26, 2026 and January 28, 2026 Webinars**

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
IFR	Interim Final Rule issued by USDOT on October 3, 2026
JOC	Jurisdiction of Original Certification/Home State
NYS UCP	New York State Unified Certification Program which includes four certifying agencies/certifiers (the Metropolitan Transportation Authority, New York State Department of Transportation, Niagara Frontier Transportation Authority 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

1 What are the new requirements to qualify for DBE and ACDBE certification under the Interim Final Rule?

Entities must submit a Personal Narrative (PN) that is individualized and detail instances of social and economic disadvantages, how it impeded success/progress in business, education, or employment and how that resulted in economic harm in both type and magnitude. The PN must be attached to a current Personal Net Worth Statement (PNW) and any other relevant financial information.



2 What changes are being made to the program going forward because of the IFR?

Going forward, there is a revised criteria for demonstrating social and economic disadvantages. Entities must demonstrate social and economic disadvantage based on their own experiences and circumstances that occurred within American society, and without regard to race or sex.

3 Are the DBE and ACDBE programs being eliminated?

The DBE and ACDBE Programs have not been eliminated.

4 Should the PN, PNW, and supporting documentation be submitted to the agency that originally certified them as a DBE or ACDBE?

Yes, the Social and Economic Disadvantaged Owner (SEDO) must send the PN, PNW, and supporting documents to the specific certifying agency that originally processed their application.

5 Are DBE/ACDBE applications including personal narratives and personal net worth statements treated as confidential documents?

These documents are confidential.

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). The [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.”

RE-EVALUATION PROCESS/TIMELINE

6 What are the steps to get Reevaluated in the DBE or ACDBE Program?

- (a) Each SEDO provides a Personal Narrative demonstrating social and/or economic disadvantage under the revised criteria, a current Personal Net Worth Statement and any other relevant financial documentation.
- (b) The certifying agency must review all submitted documentation and determine whether each firm has met its standards under the new rule. After the review, the certifying agency issues a written decision to each DBE/ACDBE firm stating whether the firm is Recertified or Decertified.

7 Is the UCP using the same system [B2Gnow] moving forward or will there be a specific email to send personal narrative and personal net worth statement to?

The UCP is using the same system, B2Gnow. Documents for re-evaluation are to be submitted via the “25 Re-evaluation” portal. Documents are not to be emailed.

8 How long is the re-evaluation process?

There is no specific set timeframe in the IFR for how long the reevaluation process must take for your firm to be reevaluated. Instead, each Unified Certification Program (UCP) partner/certifying agency must reevaluate every currently certified DBE firm as quickly as practicable . See USDOT FAQs (v. 12/1/2025), Question C-2.

9 Will the Firm’s Socially and Economically disadvantaged Owners (SEDOs) need to complete the re-evaluation process if they were not originally certified based on race or sex?

Yes, even if your firm was not originally certified under a DBE or ACDBE program based on race or sex , you will be required to participate in the reevaluation process under the new certification standards.

10 What happens if the SEDOs do not, or are unable to, comply with the new requirements and/or submission deadline?

Currently certified DBEs/ACDBEs that do not submit the required information by the UCP’s submission date may still submit the required documentation at a later time, but such firms will remain ineligible for counting towards DBE/ACDBE participation until they submit the required documentation demonstrating DBE/ACDBE eligibility under the new standards and obtain certification. See USDOT FAQs (v. 12/1/2025), Question C-13. Firms that do not submit by the requested date will be removed from the public directory.



11 Will there be an appeal process if a firm is denied recertification and what does that look like?

Should a firm be denied recertification, there is an appeal process. A firm can appeal directly to USDOT. See USDOT FAQs (v. 12/1/2025), Question C-7.

PERSONAL NARRATIVE

12 Can limited English proficiency be cited in the PN?

Yes. Applicants may reference barriers such as language in demonstrating social and economic disadvantages. However, social and economic disadvantage must be affirmatively based on the applicant's own experiences and circumstances within American society, and without regard to race or sex.

13 Are there any supporting documents that are absolutely required?

Supporting documentation for the personal narrative is welcomed though not explicitly required. Some documentation may be necessary to establish the PN as credible, quantifiable, and verifiable. See Question #27 below regarding supporting documents for the personal net worth statement.

14 How long should the Personal Narrative be?

There is no official page limit for the Personal Narrative (PN), but it should be concise and focused with sufficient detail to establish the existence of disadvantage by a preponderance of the evidence.

15 When describing economic hardship, systemic barriers, or denied opportunities, is it necessary to name specific companies, agencies, or individuals, or is a detailed, fact-based narrative, sufficient to meet the preponderance-of-the-evidence standard?

- (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.

16 What is the definition of "disadvantage" under the program?

"disadvantage" is no longer assumed based on your race or sex. [See 49 CFR 26.5 \(DBE\) and 49 CFR 23.3 \(ACDBE\) for current definition of a "socially and economically disadvantaged individual".](#)

17 What is the definition of “systemic barriers”?

In the context of the IFR and Personal Narratives, "systemic barriers" are structural or institutional obstacles that inherently limit an individual's ability to compete fairly.

18 How is someone 'similarly situated' defined? Is it using other categories like income, education, etc.?

In the context of the IFR, a "similarly situated" individual is someone who shares comparable professional, educational, or financial qualifications but has not faced the same social disadvantage or economic disadvantage.

19 Are there specific guidelines for the personal narrative?

The PN must show that the owner is socially and economically disadvantaged based on their own experiences and circumstances within American society without regard to race or sex. The owner must provide specific, individualized proof of disadvantage by a preponderance of the evidence meaning more likely than not the owner faced disadvantage. Discuss at least one specific instance of economic hardship, systemic barriers and denied opportunities. These might include denied access to business financing, educational or employment obstacles. The narrative must state how and to what extent these experiences impeded the owner's progress or success in education, employment, or business that caused economic harm, including detailed descriptions of the type and magnitude of that harm.

20 Can the impediments and barriers relate to the disadvantage owner be based on the business history?

Yes, the US DOT explicitly states that business-based barriers are acceptable and include impediments that result in lost income or denied business opportunities. The incidents or experiences discussed in the narrative must not rely, in whole or in part, on race or sex. Disadvantage must be based on individual experiences in American Society. See USDOT FAQs (v. 12/1/2025), Question C-10 through 11.

21 Who reviews and makes determinations on the personal narrative and personal net worth statement and supports financial information submitted by the firm?

The certifying agency/UCP partner to whom the firm submitted their original certification application reviews and make a determination.

22 Is there a sample narrative available?

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

PERSONAL NET WORTH STATEMENT

Refer to the attached How to Guide - Completing the Personal Net Worth (PNW) Statement

23 (a) If an owner is married with joint bank accounts, how does that person divide up the values of those accounts? (b) What factors are included in Personal Net Worth Evaluation?

- (a) Assets are reported based on actual ownership interest. Joint accounts are typically divided proportionally between spouses, unless documents are provided to support otherwise.
- (b) See 49 CFR [§ 26.68](#) for more details. When evaluating a PNW Statement an individual's assets and liabilities to determine overall net worth must comply with regulatory requirements: All assets and liabilities that the individual owns or is deemed to own must be reported in the personal net worth calculation, including:
Assets: (Cash and bank accounts, investment accounts (stocks, bonds, mutual funds), Real estate other than primary residence, value of primary residence, household content, vehicles and other personal property (boats, collectibles, etc.), Interests in businesses other than the one applying for DBE certification and Other assets with monetary value (e.g., trusts, antiques) Liabilities include mortgage and home equity loans, car loans, student loans, credit card debt and other personal liabilities that reduce net worth. The PNW is calculated by subtracting total liabilities from total assets the individual owns. Excluded from PNW is the ownership interest in the applicant firm, the individual's primary residence and retirement accounts.

24 Could you give examples of supportive documents that should be submitted with the Personal Net Worth Statement?

To support your Personal Net Worth (PNW) statement for DBE/ACDBE certification, you can provide copies of your tax returns, bank statements, realty property documentation and retirement documentation.

25 For sensitive documents such as bank statements, can account numbers be redacted?

Generally, full, unredacted financial documentation are needed to verify the personal net worth (PNW) and economic status to meet the "preponderance of evidence" standard. See 49 CFR [§ 26.61 Burden of proof](#). Contact the certifier directly for guidance. See also Question #5 above.

26 What Is the Threshold for Personal Net Worth?

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



27 Where can I find the official Personal Net Worth (PNW) statement form on the USDOT website?

The official Personal Net Worth form is available on the USDOT website and can be accessed using this hyper link [Personal Net Worth Statement](#) or through B2G Portal DBE 2025 Reevaluation Application.

INTERSTATE CERTIFICATION

28 Once a firm is reevaluated and recertified in their home state (Jurisdiction of Original Certification), will they need to submit the personal narrative and personal net worth statement to other states that they are seeking certification through the interstate process?

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 required documentation (including Revised U.S.D.O.T. Declaration of Eligibility - DOE) when submitting to other agencies.

OTHER

29 What is happening with new certifications that were in the process of being evaluated when the IFR was issued?

For firms that were in the process of being evaluated before the new change took effect on October 3, 2026, review will commence (i) after the reevaluation of previously certified (AC)DBEs has been completed by the UCP and (ii) updated forms (i.e. the Uniform Application Form) are provided by USDOT .

30 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. However, please see Question #10 above.

31 Is there a size limit for a company?

Size limit for a company 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.