

What has changed with the DBE and ACDBE programs?

DOT issued an interim final rule (IFR) that eliminated rebuttable presumptions of social disadvantage based on race and gender. Instead, all existing and new DBE/ACDBE applicants must submit a Personal Narrative (PN) and current Personal Net Worth (PNW) statement.

When is this change effective?

The IFR was published in the Federal Register on October 3, 2025 and become effective immediately. All new DBE/ACDBE applications must now follow the individualized certification process.

Is there still a public comment period?

Yes. DOT has established a 30-day comment period. You may submit comments on the IFR (identified by the docket number DOT-OST-2025-0897) by any of the methods below. **Comments must be received on or before November 3, 2025.**

- *Federal Rulemaking Portal:* <http://www.regulations.gov>. Follow the online instructions for submitting comments.
- *Mail:* U.S. Department of Transportation, Docket Operations, M-30, West Building Ground Floor, Room W12-140, 1200 New Jersey Avenue SE, Washington, DC 20590.
- *Hand Delivery:* U.S. Department of Transportation, Docket Operations, West Building Ground Floor, Room W12-140, 1200 New Jersey Avenue SE, Washington, DC 20590, between 9 a.m. and 5 p.m., Monday through Friday, except Federal holidays.

Does this mean I am no longer ACDBE/DBE certified?

No. You are still listed as certified with your Unified Certification Program (UCP). However, the IFR requires that all ACDBEs and DBEs must be reevaluated under the new eligibility criteria. Those that do not meet the new eligibility criteria or do not submit the necessary documentation required for reevaluation will be decertified.

Does this mean that I will have to submit a new application for certification?

No. The IFR does not require firms to reapply for DBE or ACDBE certification. However, firms must submit documentation in the form of a written Personal Narrative (PN) and current Personal Net Worth (PNW) statement demonstrating its eligibility under the new standards.

Watch out for, and fully read, any instructions from your certifying agency on how to submit this documentation.

What is a “Personal Narrative” and why does it matter?

The requirements for demonstrating your social and economic disadvantage are set forth in the IFR in the revised regulation: 49 C.F.R. § 26.67. The business owner “must demonstrate social and economic disadvantage (SED) affirmatively based on their own experiences and circumstances within American society, and without regard to race or sex.” The Personal Narrative (PN) is a required written statement by the business owner that describes “specific instances of economic hardship, systemic barriers, and denied opportunities that impeded the owner’s progress or success in education, employment, or business, including obtaining financing on terms available to similarly situated, non-disadvantaged persons.”

Your PN must establish that you are economically disadvantaged compared to others in similar situations who are not disadvantaged.

How long will reevaluation take?

The IFR requires that each Unified Certification Program (UCP) reevaluate each ACDBE/DBE as quickly as practicable; however, the exact timeline will vary by state and certifying agency. Thousands of firms need to be reevaluated, which will take time.

Can joint venture partners and primes continue to operate under existing agreements?

Yes, all parties have a binding contract with all the enumerated rights and obligations.

Does the IFR allow prime vendors to cease using their DBE or ACDBE vendors on contracts awarded prior to October 3rd?

No. All contractual obligations between prime contractors and their subcontractors remain in effect, and both parties are required to comply with the terms of their agreements.

Will there be an amendment to active awarded contracts that were assigned a DBE or ACDBE goal prior to October 3rd?

No. The IFR does not require amendments to existing contracts that were awarded prior to October 3, 2025.

What should I do now?

Review the [IFR](#) and [IFR Guidance](#) to learn the details of the changes. Start considering the information that you will need to draft your personal narrative immediately, update your Personal Net Worth Statement and collect any relevant, supporting financial documentation.



Division of Small Business Opportunity
www.denvergov.org/dsbo
certificationinfo@denvergov.org

FAQs:
U.S. Department of Transportation
(DOT)'s October 3, 2025, Interim
Final Rule (IFR)



Denver International Airport
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Watch out for, and fully read, any communications from your certifying agency and respond promptly with any requests for information and documentation.

How can I stay competitive during this transition?

Focus on two areas:

1. **Certification Readiness:** Complete your Personal Narrative, update your Personal Net Worth Statement and gather documentation now.
2. **Operational Excellence:** Continue demonstrating strong performance on existing contracts. Airports and primes prioritize partners who have proven they add value beyond credit.

Does this change affect my City and County of Denver certifications?

No. The recent changes to the ACDBE/DBE program do **not** impact your City of Denver certifications. These are separate programs with different requirements and oversight.