Washington State Office of
MINORITY & WOMEN'S
Business Enterprises

DBE & ACDBE
Personal Narrative of Social Disadvantage Guidelines

Personal Narrative Guidelines

Washington State Office of MINORITY & WOMEN'S Business Enterprises

About this guide

This guide was created to help certified Disadvantage Business Enterprise (DBE) and Airport Concession Disadvantaged Business Enterprise (ACDBE) owners write their Personal Narratives of Social Disadvantage.

Following these guidelines and examples does not guarantee a DBE owner's Personal Narrative will show they are **socially and economically disadvantaged**.

Each Personal Narrative will be evaluated on a case-by-case basis.

- ✓ DBEs that are already certified can use this guide to submit their Reevaluations.
- ✓ New applicants can also use this guide to develop a Personal Narrative.

Personal Narrative Guidelines

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First, a Word of Encouragement…

We recognize you already invested time and energy into getting certified. This new requirement is a much smaller step to confirm your DBE or ACDBE status with OMWBE.

- Personal Narratives must meet the social disadvantage requirements set forth by USDOT.
- Personal Narratives can be one page, or they can be longer. There is no length requirement.
- Your submission will not be reviewed for grammar or spelling.
- Your narrative is about you. It can be as simple or complex as you make it.
- This guide is designed to help you, but you don't need to follow it exactly. We included as much detail as possible, anticipating questions.
- We created a Personal Narrative Form as an optional tool for you to use. The form aligns with these guidelines to help you craft your narrative.

Personal Narrative Form

Personal Narrative Guidelines

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Why We're Requiring Personal Narratives

- The eligibility requirements for the DBE and ACDBE programs changed on October 3, 2025, due to an Interim Final Rule (IFR) issued by the United States Department of Transportation (USDOT). This change is not only for new DBE/ACDBE applicants but also for previously certified DBE/ACDBE businesses, which makes it retroactive. The IFR removes the presumption of social and economic disadvantages based on race and/or gender. **Program changes were adopted into the Final Rule by USDOT on September 25, 2026.**

- The updated regulation Title 49 C.F.R. 26.67 moves to non-presumptive disadvantage that requires all DBE applicants to provide a Personal Narrative demonstrating social and economic disadvantage based on their owner experiences and circumstances in American society, without any presumptions based on race or gender. The Personal Narrative must be submitted with a current Personal Net Worth statement and any other financial information the owner considers relevant.

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Who is Socially Disadvantaged for DBE Certification?

49 CFR § 26.5 defines a Socially and Economically disadvantaged individual as a citizen or lawfully admitted permanent resident of the United States who the certifier finds to be socially and economically disadvantaged on a case-by-case basis. The determination cannot be based in whole or in part on a presumption based on race or gender.

The following guidance for DBEs also applies to ACDBEs.

If your **Jurisdiction of Original Certification (JOC)** is outside of Washington State, you must apply for DBE/ACDBE certification with your JOC before certifying with OMWBE.

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How to write a Personal Narrative of Social Disadvantage

- DBE owners must write a Personal Narrative that describes their social and economic disadvantage based on their own experiences in American society without any presumptions based on race or gender.
- If a business has multiple owners, each owner that the DBE certification relies upon, making up at least 51% of the ownership, should complete and submit a Personal Narrative. These are also the owners that control the DBE and previously completed affidavits or Declarations of Eligibility along with Personal Net Worth statements when applying for certification.
- If you are a DBE owner, the following process is to help you create your Personal Narrative of social disadvantage.

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Step 1: Brainstorm

Identify examples of circumstances and experiences that contributed to your social and economic disadvantage. These examples may have taken place any time during your life, from infancy to adulthood.

To help get you started, think of times you've experienced:

- Having too little money or too few resources (economic hardship)
- Facing obstacles that prevented you from fully participating in society, accessing equal opportunities, or interacting freely (social barrier)
- Missing chances in life that were blocked, withheld, or lost, leaving you unable to act on them (denied opportunities)

What is the objective identifiable feature, status, or condition that contributed to these experiences?

How has this affected your advancement in education, career, business, or obtaining financing, ultimately leading to financial loss or setback within American society?

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Format (slide 1 of 3)

- You will need to take your example(s) of social disadvantage and work through the Personal Narrative layout, which we simplified into three sections.
- We encourage you to provide enough evidence or details to clearly tell your story. Provide dates, timeframes, locations, and information about individuals, businesses, schools, and organizations involved to help demonstrate your personal experiences.
- Your Personal Narrative should include at least one example of social disadvantage that is worked through the narrative layout, Sections 1-3. Multiple examples of social disadvantage can be used and may strengthen your narrative, if each example is worked through the full narrative layout.

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Format (slide 2 of 3)

- Your Personal Narrative itself does not need to be numbered. We recommend following this format to help ensure your narrative addresses all required information. These numbers are simply used for guiding you and ensuring you include all the details in a way that clearly shows cause and effect, relating social disadvantage to the hardships, barriers, and economic disadvantages experienced during your life.
- Supporting documentation is encouraged when available but is not automatically required. Applicants must establish disadvantage by a preponderance of the evidence and may be asked to provide additional information.
- You must submit your Personal Narrative with a current USDOT Personal Net Worth Statement.
    - The Personal Net Worth Statement will also be available in the OMWBE online DBE/ACDBE 2025 IFR Recertification Application.

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Format (slide 3 of 3)

- Personal Narratives should be submitted in electronic format:
  - Preferred file types: .DOCX (Microsoft Word) and .PDF (Portable Document Format)
  - Accepted file types: .JPEG or .JPG (Joint Photographic Experts Group), .PNG (Portable Network Graphics), and .XLSX (Microsoft Excel)
- At the top of the Personal Narrative, include your business name, your name, and your percentage of ownership in the DBE.
- Download the Personal Narrative Form (optional): omwbe.wa.gov/pn-form



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Personal Narrative Layout for DBE Owners to Follow



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1. The Basis of Your Social and Economic Disadvantages:

Identify and describe the specific instances and circumstances of economic hardships, social barriers, and denied opportunities that you have experienced in your lifetime.

- Name and describe at least one **objective distinguishing feature** (identifiable status or condition) you have that prompted these experiences.
- Describe how the objective distinguishing feature is the basis for your circumstances.
- Include the details in your examples of who, what, where, why, and when.
- Your examples must be in American Society, not in other countries.
- You may mention race or gender in your Personal Narrative. However, you must provide evidence based on your individual experience, not on group-based presumptions.

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2. Impact on Education, Career, Business, and Financing:

How have the economic hardships, social barriers, and denied opportunities created obstacles to your progress or success, in any of the following areas (include all that apply):

- Education
- Employment
- Business
- Obtaining financing on terms available to non-disadvantaged individuals with comparable qualifications.

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3. Describe the Economic Harm:

Explain how and to what extent each of these situations caused you economic harm compared to similar situations with non-disadvantaged individuals.

- Provide a full description of the type of economic harm caused.
- Include details about the extent or magnitude of the economic harm.
- Descriptions can relate to the Personal Net Worth statement you are providing showing your economic disadvantage.

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Common Personal Narrative Mistakes & How to Avoid Them

- Not linking and explaining the cause and effect
- Not including an objective distinguishing feature or describing the connection
- Generalizing
- Leaving out important facts
- No economic harm

(Note: Examples used do not guarantee a finding of social disadvantage).

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Common Personal Narrative Mistakes & How to Avoid Them

Not linking and explaining the cause and effect

- Don't just explain the initial reason for social disadvantage followed by difficulties and barriers that happened later. Clearly explain how one caused the other.
- Explain the initial reason for social disadvantage and ensure there's a clear connection that shows cause and effect. How did the hardships, barriers, or denied opportunities greatly impact you in the areas of education, employment, business, and/or obtaining financing? Describe how those difficulties led to your economic disadvantage compared to similarly situated non-disadvantaged individuals.

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Common Personal Narrative Mistakes & How to Avoid Them

Not including an objective distinguishing feature or describing the connection

Per the USDOT Final Rule issued September 2026, your Personal Narrative must include at least one objective distinguishing feature (ODF) that you have that is the basis for your social and economic disadvantage. This is an identifiable status or condition that has caused you discrimination, bias, or barriers.

- This can be something you were born with or into, or that occurred during your lifetime.
- Be sure to clearly identify and describe your objective distinguishing feature in your narrative.
- Required to show clearly show the reader how it prompted your denied opportunities, social disadvantage, or economic hardships.
- We cannot approve narratives that don't include the ODF and links it to your disadvantages

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Common Personal Narrative Mistakes & How to Avoid Them

Generalizing

- Don't provide generalized statements about disadvantages such as "People that experienced _____ have difficulties" or "People from _____ have a hard time receiving work…" or "I bid on many contracts but haven't won any." These are too general and do not detail your personal experience.
- Instead, you should describe your exact personal experience, including all the details, such as "In summer 2015 I was hoping to receive a contract, and I went to pre-bid meeting where the project manager said they would never contract with me since …. but they welcomed everyone else to bid the job."

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Common Personal Narrative Mistakes & How to Avoid Them

Leaving out important facts

A DBE owner attempts to establish that the social disadvantage they described caused them to receive lower pay than their coworkers who were not disadvantaged, when they worked for another business before starting their own. The DBE owner explains that while working for company X, they received less compensation than other counterparts.

- Without additional facts, that claim is insufficient to establish an incident of bias that could lead to a finding of social disadvantage.
- Without additional facts, it's unclear why the DBE owner claiming social disadvantage was paid less than their non-disadvantaged coworkers. The coworkers may have had superior qualifications or greater responsibilities in their employment position resulting in higher pay.
- In their narrative, the DBE owner must identify their qualifications (education, experience, years of employment, supervisory functions) as being equal or superior to that of their coworkers who were non-disadvantaged.

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Common Personal Narrative Mistakes & How to Avoid Them

No Economic Harm

- Example: A DBE owner describes instances where one or more non-disadvantaged clients say derogatory statements about them because of their social disadvantage. However, after each instance, the DBE owner acknowledges that the clients gave them contracts or otherwise continued to do business with them.
    - Despite suffering discriminatory experiences, this DBE owner has not established social disadvantage because the discriminatory experience did not have an adverse effect on their business.
    - While this is a difficult situation to experience, it did not economically harm the owner. Therefore, it would not be useful in the owner's Personal Narrative.

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How to Submit your Personal Narrative

Submit your Personal Narrative using the Re-evaluation Application:

1. Log into your OMWBE account at https://omwbe.diversitycompliance.com
2. Under "Key Actions" choose "Renew/Apply for Certification"
3. Under "Select an Option" choose "Your firm is currently certified with OMWBE"
4. Choose: "You are an existing DBE/ACDBE, headquartered in Washington State, and you would like to submit for 2025 Re-evaluation"
5. Choose: "Submit a 2025 Re-evaluation Application"
6. Upload your Personal Narrative directly into the application
7. Complete the USDOT Personal Net Worth Statement included in the application

Re-evaluation Applications are **REQUIRED** for DBE and ACDBE Certifications.
Re-evaluation Applications are **NOT REQUIRED** for Federal SBE, or State MBE, MWBE, WBE, CBE, SEDBE, LGBTQBE or PWSBE Certifications.

Final Rule Timeline

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USDOT Final Rule
Sept. 25, 2026

USDOT issues Final Rule, replacing the Interim Final Rule (IFR) from 2025, and establishes a **new timeline** for DBE and ACDBE reevaluations.

call for submissions

Don't Wait! Apply early to allow for processing time.

We strongly encourage you to submit your application for reevaluation by Dec. 1, 2026.

Notice of Nonresponse
Dec. 24, 2026

OMWBE sends a **Notice of Nonresponse**, allowing businesses to submit re-eval applications until **Mar. 24, 2027**.

90-day grace period begins.

90-day grace period

Notice of Disqualification
Mar. 24, 2027

OMWBE sends a **Notice of Disqualification (NOD)** letter to nonresponsive firms.

Reevaluation period officially ends.

processing time

STOP

Submit materials by **March 24, 2027**

DISQUALIFICATION RISK

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Resources

- OMWBE Certification Portal: Access Equity
- OMWBE Final Rule and Personal Narrative FAQ
- OMWBE Personal Narrative Form
- USDOT Final Rule: September 2026 Final Rule Documents
- Federal Register: DBE and ACDBE Program Revisions
  - This covers adjustments from the 2025 Interim Final Rule (IFR) to the 2026 Final Rule
- USDOT Final Rule FAQs: DBE_Final Rule_FAQs 09-28-2026_0.pdf
- USDOT eCFR :: 49 CFR 26.67 -- Social and economic disadvantage.
- USDOT Personal Net Worth Statement: DBE/ACDBE PNW Statement

Contact

Washington State Office of MINORITY & WOMEN'S Business Enterprises

Tabor 100

Consultants are available to assist with your Personal Narrative.

Phone: (206) 368-4042

Website: frontdesk@tabor100.org

DBE/ACDBE Assistance: Request Form | Click Here

OMWBE

Email: support@omwbe.wa.gov

Phone: (360) 664-9750

Website: omwbe.wa.gov

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