Washington State Office of MINORITY & WOMEN'S Business Enterprises

USDOT Final Rule and Personal Narrative Frequently Asked Questions (FAQs)

On Sept. 25, 2026, the United States Department of Transportation (USDOT) issued a Final Rule replacing the Interim Final Rule (IFR) from Oct. 3, 2025. The Final Rule removes the presumption of social and economic disadvantage based on race or gender from the following programs:

- **Disadvantaged Business Enterprise (DBE)**
- **Airport Concession Disadvantaged Business Enterprise (ACDBE)**

This FAQ covers some frequently asked questions about the Final Rule, and the Personal Narrative requirement to establish social disadvantage to remain certified in the DBE and ACDBE programs. See the USDOT website for additional information.

A Glossary of Terms and Acronyms is available at the end of this FAQ.

Key Takeaways

1. **We strongly encourage Washington State businesses to submit a reevaluation application by December 1, 2026**, to maintain DBE or ACDBE certification. WSDOT is preparing to reinstate enforceable DBE contract goals, subject to applicable federal requirements and implementation guidance.
2. **Out-of-state businesses** must get reevaluated in the state that originally certified them, known as the Jurisdiction of Original Certification (JOC). This step is required before we can restore DBE or ACDBE certification with OMWBE.
3. **Applicants may include race and gender in Personal Narratives**, but this alone does not establish social disadvantage. You must describe disadvantage based on your individual experience, not on group-based presumptions.
4. **Personal Narratives (PNs)** are now **confidential** and prohibited from release without written consent from the submitting firm.

Office of Minority & Women's Business Enterprises
1110 Capitol Way S #150, Olympia, WA 98501
Phone: (360) 664-9750 | omwbe.wa.gov

Frequently Asked Questions

1. **Does the Final Rule apply to businesses with OMWBE State Certification?**
    a. No. The Final Rule is a federal rule change affecting all DBE and ACDBE certified businesses. There are no new requirements for State Certification (MWBE, MBE, WBE, CBE, SEDBE, LGBTQBE, PWSBE) or Federal Small Business Enterprise (SBE, also known as FSBE) certification.
    b. If your business is certified in both our State and Federal Certification programs, your federal DBE or ACDBE certification requires you to submit a reevaluation application along with a Personal Narrative (PN) and current Personal Net Worth (PNW) statement.
    c. Alaska Native Corporations (ANCs) are exempt from the Final Rule, and, therefore, not required to submit a PN or current PNW Statement.

2. **My business is headquartered outside of Washington state. Do I need to submit a reevaluation application to OMWBE to keep my DBE or ACDBE certification?**
    a. No. If your business obtained DBE or ACDBE certification in another state, that is your Jurisdiction of Original Certification (JOC).
    b. You must complete the reevaluation process in your JOC first, then send us a copy of your JOC's decision letter, or a screenshot of your active listing in their directory, and OMWBE will restore your DBE/ACDBE certification.

3. **When is the deadline to submit my Reevaluation Application to OMWBE?**
    a. We strongly encourage you to submit your reevaluation application by **December 1, 2026**, to allow for processing time.
    b. Businesses that do not submit a reevaluation application by December 24 will receive a **Notice of Nonresponse** from OMWBE.
    c. We will accept reevaluation applications submitted after December 24 for a final 90-day grace period ending on March 24, 2027.

4. **Will my business be decertified as a DBE or ACDBE if I do not submit my reevaluation application before March 24, 2027?**
    a. No. Decertification does not apply to reevaluations. After March 24, 2027, nonresponsive DBEs and ACDBEs will receive a **Notice of Decision (NOD) automatically disqualifying the firm** without further administrative proceedings. This eliminates the option to get reevaluated.
    b. Disqualified businesses must start a new federal application to participate in the DBE or ACDBE programs.
    c. Businesses that have not submitted a reevaluation application have already been delisted from our public directory and hidden from view.

5. **Who will evaluate my Personal Narrative?**
    a. OMWBE staff will evaluate all Personal Narratives submitted to us by Washington state DBEs and ACDBEs. We are following the process established by the IFR, and maintained in the 2026 Final Rule, which requires Unified Certification Programs (UCPs) like OMWBE to evaluate all submissions.

6. **Is the Personal Narrative requirement different from a standard annual Declaration of Eligibility (DOE)?**
    a. Yes. The Personal Narrative requirement is different from your annual renewal. It does not change the federal requirement that DBE and ACDBEs must submit an annual Declaration of Eligibility (DOE) with your business's most recent gross receipts. Renewing annually allows us to declare that your business meets the eligibility requirements for DBE or ACDBE certification.

7. **What is the difference between DBE and SBE certification?**
    a. SBE is a race- and gender-neutral certification, that does not rely on social disadvantage—just economic disadvantage. Firms that are certified as DBEs automatically meet the criteria for Federal SBE certification.
    b. Federal SBE certification does not require a Personal Narrative statement. You will keep your SBE certification, even if you opt out of DBE certification.
    c. SBE certification does not count towards DBE goals. The Washington State Department of Transportation (WSDOT) also sets Federal SBE goals.

8. **Do first-time DBE or ACDBE applicants have to submit Personal Narratives?**
    a. Yes. The Final Rule applies to all new applicants as well as businesses that held federal certifications with OMWBE before October 3, 2025.

9. **Can I opt out, if I do not want to submit a Personal Narrative?**
    a. Yes. We encourage every DBE and ACDBE owner to submit a reevaluation application, but we recognize that some may want to be removed from the DBE or ACDBE programs instead. If you do not intend to submit a Reevaluation Application and want to voluntarily withdraw your DBE or ACDBE certification, please:
        i. Email your request in writing to support@omwbe.wa.gov.
        ii. Clearly state that you would like to voluntarily withdraw your DBE or ACDBE certification.

10. **What happens to my Federal SBE certification if I withdraw my DBE certification?**
    a. Nothing. Your Federal SBE certification will remain active, even if you received it when you applied for DBE certification.
    b. Your FSBE certification will also remain active if you were disqualified from the DBE reevaluation process, due to lack of response.
    c. The standard renewal process still applies for all OMWBE certifications.
    d. WSDOT sets dedicated Federal SBE goals in addition to DBE goals.

11. **Will my Personal Narrative and Personal Net Worth (PNW) statement be released to the public or competitors?**
    a. No. The contents of your Personal Narrative (PN) and Personal Net Worth (PNW) statements are confidential. Under 49 CFR 26.109(a)(2), we are prohibited from releasing any information reasonably construed as confidential business information—which explicitly includes applications for DBE certification and supporting information—to any third party without your written consent.

Technical Assistance Providers

OMWBE for Certification support:

- support@omwbe.wa.gov
- (360) 664-9750

Tabor 100 for Personal Narrative support:

- Request DBE/ACDBE Assistance
- TechnicalAssistance@Tabor100.org
- (206) 368-4042

APEX Accelerator for general DBE support:

- info@washingtonapex.org
- washingtonapex.org

How to submit your Re-evaluation Application

Please Note: *You may see references to both the "Interim Final Rule (IFR)" and "Final Rule" in our online portal. The process to reapply is the same, and the 2025 Re-evaluation Application is the correct application to use for your DBE or ACDBE reevaluation.*

Follow the steps below to submit your materials through our secure online portal:

1. Log in to your OMWBE account through our Access Equity Portal
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 IFR Re-evaluation"
5. Chose " 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

Personal Narratives submitted in languages other than English will be translated by a third-party service.

For more information about writing your Personal Narrative, please refer to our Personal Narrative Guidelines. Additional resources are also located on this page.

Glossary of Terms & Acronyms

- **ACDBE** – Airport Concession Disadvantaged Business Enterprise
- **DBE** – Disadvantaged Business Enterprise
- **DOE** – Declaration of Eligibility
- **IFR** – Interim Final Rule
- **JOC** – Jurisdiction of Original Certification
- **NOD** – Notice of Decision
- **ODF** – Objective Distinguishing Feature
- **OMWBE** – Office of Minority and Women's Business Enterprises
- **PN** – Personal Narrative
- **PNW** – Personal Net Worth
- **SBE/FSBE** – Federal Small Business Enterprise
- **SEDO** – Socially and Economically Disadvantaged Owner
- **UCP** – Unified Certification Program
- **USDOT** – United States Department of Transportation
- **VOB** – Veteran Owned Business
- **WSDOT** – Washington State Department of Transportation