

DELAWARE DEPARTMENT OF TRANSPORTATION

Office of Civil Rights

DeIDOT DBE/ACDBE Reevaluation Personal Narrative Frequently Asked Questions

49 CFR Part 26 | Final Rule Effective September 25, 2026

Purpose. This DeIDOT FAQ is intended to help currently certified DBE/ACDBE firms understand DeIDOT's Personal Narrative (PN) submission and reevaluation process under the September 25, 2026 Final Rule. It reflects applicable requirements of 49 CFR Part 26 and USDOT's DBE Final Rule Frequently Asked Questions. This is DeIDOT's FAQ and is separate from USDOT's official FAQs, linked under USDOT Resources below. This FAQ should be read together with DeIDOT's required Personal Narrative Worksheet, reevaluation notice, and current Personal Net Worth (PNW) Statement.

1. Why is DeIDOT reevaluating currently certified DBE/ACDBE firms?

USDOT requires Unified Certification Programs (UCPs) to reevaluate currently certified firms under the individualized eligibility requirements in 49 CFR Part 26. DeIDOT must determine whether each owner subject to reevaluation meets the applicable social and economic disadvantage requirements under the current regulation.

2. Why do I have to submit a Personal Narrative?

Under 49 CFR § 26.67, applicable owners must affirmatively demonstrate social and economic disadvantage based on their own experiences and circumstances within American society, without any presumption of disadvantage based on race or sex. The Personal Narrative provides the individualized information required for that determination.

3. What is the DeIDOT Personal Narrative Worksheet?

DeIDOT's Personal Narrative Worksheet is the required submission tool for organizing the information required for the Personal Narrative. The Personal Narrative is the individualized information required by USDOT; the Personal Narrative Worksheet is DeIDOT's tool for presenting that information. The Worksheet does not limit the information, experiences, circumstances, or other relevant information you may provide. Your Personal Narrative submission includes the completed DeIDOT Personal Narrative Worksheet and may also include additional narrative pages, attachments, and other relevant information you provide.

4. Do I have to use DeIDOT's Personal Narrative Worksheet?

Yes. Owners subject to DeIDOT's reevaluation process must complete and submit the current DeIDOT Personal Narrative Worksheet as the required submission tool. The Worksheet is required, not optional. It is designed to organize information relevant to 49 CFR § 26.67 and does not limit what you may submit. You may provide additional narrative pages, attachments, or information in another format as needed to fully describe your individual experiences and circumstances. This additional information supplements, but does not replace, the required Worksheet.

5. I previously submitted a Personal Narrative. Do I still have to complete the DeIDOT Personal Narrative Worksheet?

Yes. Owners subject to DeIDOT's reevaluation process must complete and submit the current DeIDOT Personal Narrative Worksheet, even if they previously submitted a Personal Narrative. You may incorporate relevant information from your earlier submission, updating or supplementing it as needed to address the current requirements of 49 CFR § 26.67. Previously submitted material does not replace the required Worksheet. You may also provide additional narrative pages, attachments, or other relevant information.

6. What happens to the Personal Narrative or other information I previously submitted?

Previously submitted information may remain part of your certification or reevaluation record and may be considered when relevant. However, it does not replace the current DeIDOT Personal Narrative Worksheet and PNW Statement required for this reevaluation process.

7. What is an objective distinguishing feature?

Under 49 CFR § 26.67(a)(2), your Personal Narrative must identify at least one objective basis for your disadvantaged status. The regulation provides that this basis may be any identifiable status or condition and refers to it as an objective distinguishing feature (ODF). You must describe the objective distinguishing feature in sufficient detail and explain why you believe it prompted the economic hardship, social barriers, or denied opportunities you experienced.

8. Can I discuss experiences involving my race or sex?

Yes. If race or sex is relevant to an individual experience or circumstance you describe, you may include that information. DeIDOT will consider individualized evidence you provide but will not presume that you are disadvantaged based on race or sex.

9. What information should I include in my Personal Narrative?

Describe your own specific experiences and circumstances, including what occurred, when and where it occurred, who or what was involved, how the experience relates to the objective distinguishing feature you identified, how it affected your progress or opportunities, and any resulting economic harm. Provide information that is known or reasonably available to you.

10. How much detail should I provide?

Provide enough factual detail for DeIDOT to understand and evaluate the experience or circumstance. USDOT explains that a Personal Narrative should describe who, what, where, why, when, and how the disadvantage occurred. Specific dates may be approximate if exact dates are not known. There is no required page length, and DeIDOT will not impose a page limit or require you to address a particular subject area that is not applicable to your circumstances.

11. Is there a required number of experiences I must describe?

No. There is no prescribed number of experiences or circumstances that you must describe. USDOT explains that a Personal Narrative should reflect a pattern of specific instances and demonstrate disadvantage that is chronic and substantial rather than isolated or fleeting. DeIDOT will not base its determination solely on the number of examples provided; the quality and substance of the information presented are important to the evaluation.

12. What is economic harm, and what information should I provide?

Under 49 CFR § 26.67, the Personal Narrative must explain how and to what extent the impediments described by the owner caused economic harm, including a description of the type and magnitude of that harm. Economic harm may include financial or economic effects such as lost or delayed opportunities, reduced business or employment opportunities, difficulty obtaining financing or capital, less favorable financing terms, increased costs, lost income or revenue, or another economic effect related to the experience described. Provide the amount or magnitude of the harm to the extent known or reasonably estimated. If an exact dollar amount is not known, describe the economic impact as specifically as you reasonably can.

13. What does 'non-disadvantaged individuals with comparable qualifications' mean?

The regulation focuses on comparison with non-disadvantaged individuals who have qualifications comparable to yours. Depending on the context, this may be a classmate, former coworker, peer, or another business owner who received more favorable treatment despite having comparable qualifications, such as similar training, skills, experience, education, professional credentials, work history, or industry qualifications. The comparison does not require you to obtain another person's private financial information.

14. Do I have to obtain another person's private or confidential information to make a comparison?

No. You are not expected to obtain another person's confidential financial records or other private information. Provide comparison information that is known or reasonably available to you and explain the basis for the comparison.

15. Do I have to submit supporting documents?

Not necessarily. You may submit documents or other information that help explain or support your Personal Narrative. Independent corroborating documentation is not required for every experience or circumstance you describe, and DeIDOT will not deny a firm solely because supporting documentation is unavailable. DeIDOT may request specific additional information or clarification when necessary to complete its review.

16. Do I also have to submit a Personal Net Worth Statement?

Yes. Under 49 CFR § 26.67 and § 26.111, a current Personal Net Worth (PNW) Statement is required as part of the reevaluation submission. Submit the current PNW Statement together with your Personal Narrative submitted using the required DeIDOT Personal Narrative Worksheet and any other financial information you consider relevant.

17. How will DeIDOT review my submission?

DeIDOT will review the complete reevaluation record and evaluate all material claims and information you present fully and objectively. This includes your Personal Narrative, current PNW Statement, additional narrative pages or attachments, relevant information already in the record, responses to requests for additional information, and other relevant information obtained during the review. DeIDOT will not limit its evaluation to the questions or categories appearing on the DeIDOT Personal Narrative Worksheet. The determination is individualized and based on the record as a whole under the applicable requirements of 49 CFR Part 26 and the preponderance-of-the-evidence standard.

18. Does DeIDOT use a score or point system to decide whether I qualify?

No. DeIDOT does not use a numerical score, weighted factors, or a minimum passing score. The determination is individualized and based on whether the applicable requirements are demonstrated by a preponderance of the evidence.

19. What happens if DeIDOT needs more information?

DeIDOT may send you a specific request for additional information or clarification. The request will identify what is needed and provide a timeframe and instructions for responding. If DeIDOT identifies an issue or deficiency in your submission, you may provide additional information in a bona fide attempt to correct or supplement the record before DeIDOT makes its determination. DeIDOT may provide general assistance or guidance about the information needed to complete the record. A request for additional information does not by itself mean that DeIDOT has made an adverse eligibility determination.

20. What are the possible outcomes of the reevaluation?

After substantive reevaluation, a firm will either be retained as a DBE or disqualified from the DBE program. DeIDOT will provide written notice of the determination. Firms that do not submit the required reevaluation information are handled separately under the federal nonresponse procedures.

21. What happens if I do not submit my Personal Narrative and PNW?

DeIDOT must allow firms until December 24, 2026 to submit the Personal Narrative and current PNW Statement required for reevaluation. A firm that fails to submit its PN and PNW Statement by the date the UCP completes its reevaluation process must be issued a written notice of nonresponse. That notice will explain that the firm has until March 24, 2027 to submit its reevaluation package. If the firm does not submit the required documentation by March 24, 2027, DeIDOT will issue a Notice of Decision disqualifying the firm for failure to provide the required PN and PNW Statement, as provided by 49 CFR § 26.111(d).

22. When should I submit my reevaluation materials?

Submit your Personal Narrative using the completed DeIDOT Personal Narrative Worksheet, together with your current PNW Statement and other applicable information through [DeIDOT's Civil Rights Compliance Reporting System](#) as soon as possible. Early submission provides DeIDOT time to review your information, request additional information or clarification when necessary, and provide you time to respond during the reevaluation process. Under USDOT's reevaluation procedures, DeIDOT must allow firms until December 24, 2026 to submit the required Personal Narrative and current PNW Statement.

23. I am Native American, Native Hawaiian, or Alaska Native. Do I still have to submit a Personal Narrative?

If your business is individually owned by you, yes. An individual's Native American, Native Hawaiian, or Alaska Native status does not by itself exempt an individually owned firm from the Personal Narrative requirement. Different certification provisions apply when the qualifying ownership interest is held by an Indian Tribe, Native Hawaiian Organization (NHO), or Alaska Native Corporation (ANC), rather than by an individual. Contact DeIDOT if you are unsure which ownership structure applies to your firm.

24. How do I submit my documents?

Submit the completed DeIDOT Personal Narrative Worksheet, current PNW Statement, and any additional narrative pages, attachments, or other applicable information through [DeIDOT's Civil Rights Compliance Reporting System](#) using the document submission areas identified in DeIDOT's reevaluation notice.

25. Will information I submit be kept confidential?

Yes. The contents of Personal Narratives and PNW Statements are confidential. Under 49 CFR § 26.109(a)(2), DeIDOT may not release information that may reasonably be construed as confidential business information to a third party without the submitting firm's written consent, subject to the transmission requirements in 49 CFR Part 26, including certification appeals and interstate certification.

Questions or Assistance

Delaware Department of Transportation - Office of Civil Rights - DBE Program
Contact information will be provided in the firm's reevaluation notice.

USDOT Resources

September 25, 2026 Final Rule

<https://www.federalregister.gov/documents/2026/09/25/2026-19688/disadvantaged-business-enterprise-and-airport-concession-disadvantaged-business-enterprise-program>

USDOT DBE Final Rule Frequently Asked Questions

https://www.transportation.gov/sites/dot.gov/files/2026-09/DBE_Final%20Rule_FAQs%2009-28-2026_0.pdf

Important: This FAQ is a general explanation of DeIDOT's reevaluation process and does not replace 49 CFR Part 26, applicable USDOT requirements, or the instructions in DeIDOT's official reevaluation notice.