

## **Slide 1 – Understanding the Personal Narrative Requirement**

This training walks through the Personal Narrative and Personal Net Worth (PNW) reporting requirements for DBE and ACDBE certification. The Personal Narrative is a required part of the certification process and helps determine whether an owner has experienced social and economic disadvantage under federal regulations. The PNW Statement follows a similar reporting requirement to when you initially applied for certification.

Today, we'll talk about what information needs to be included, how MaineDOT reviews Personal Narratives, and some common mistakes to avoid.

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## **Slide 2 – What Is a Personal Narrative?**

A Personal Narrative is a written explanation of your own experiences of disadvantage. It is required for DBE and ACDBE certification. If a business has multiple owners, each individual whose ownership and control count toward the required 51 percent must submit their own narrative. This is not about your business history; it is about the individual owner.

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## **Slide 3 – Why MaineDOT Requires This Narrative**

Federal DBE rules were revised by USDOT effective October 3, 2025. Under these rules, there is no automatic presumption of disadvantage. Applicants must affirmatively demonstrate disadvantage based on their own experiences. MaineDOT is required to follow these federal standards exactly.

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## **Slide 4 – What the Law Requires (49 CFR § 26.67)**

The regulation requires that the disadvantage be proven by a preponderance of the evidence, meaning it must be more likely than not. The experiences described must be chronic and substantial, not isolated or minor. Importantly, those experiences must have resulted in material economic harm, not just frustration or inconvenience. Applications may be denied if the personal narrative relies primarily on race or sex and does not demonstrate individualized disadvantage supported by evidence.

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## **Slide 5 – What MaineDOT Evaluates**

MaineDOT can only evaluate personal experiences that occurred in the United States. We examine barriers that impact education, employment, business opportunities, or access to capital. The key question is whether those barriers caused real economic or professional harm.

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## **Slide 6 – Your Narrative Must Be About You**

The Personal Narrative must focus on your individual experiences. Business challenges can be included only if you clearly explain how they personally affected you as an owner. Submitting a general business history or timeline without personal impact does not meet the requirement.

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### **Slide 7 – Describe Specific Incidents**

General statements are not enough. Each example must describe a specific incident that occurred. Reviewers must understand exactly what happened and why it created a barrier. Vague statements make it impossible to evaluate whether a disadvantage occurred.

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### **Slide 8 – What Details Each Incident Must Include**

Each incident should clearly identify who was involved, what happened, and when and where it occurred. This includes the individual or organization that made the decision. These details allow reviewers to evaluate credibility, consistency, and relevance.

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### **Slide 9 – Explain Why the Incident Was a Barrier**

Applicants must explain why the incident created a barrier. This includes identifying what rule, policy, or action caused the obstacle and why it was discretionary or unequal. You should clearly explain how the action limited your opportunity.

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### **Slide 10 – Demonstrate Material Economic Harm**

Federal rules require a showing of material economic harm. This could include lost income, lost contracts, denied promotions, delayed business growth, or higher costs. The narrative must explain how the incident caused real financial or professional harm.

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### **Slide 11 – Magnitude and Duration of Harm**

Where possible, estimate the size of the loss, even if it is approximate. Explain whether the harm was short-term or ongoing. Most importantly, clearly link the harm directly back to the specific incident you described.

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### **Slide 12 – Compare to Similarly Situated Persons**

Applicants must explain how their outcome differed from that of similarly situated individuals or businesses. This could mean people with similar education or experience, or businesses of similar size, age, and industry. This comparison helps distinguish disadvantage from ordinary hardship.

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### **Slide 13 – Types of Experiences You May Include**

You may include experiences related to education or training, employment, business ownership, or access to capital. You do not need examples in every category, only those that apply to your own experience.

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### Slide 14 – Examples That Do NOT Meet the Standard

Examples that do not meet the standard include vague statements, normal business risk, unsupported claims of bias, or group-based assumptions. These statements lack the detail needed for reviewers to evaluate what happened and whether it meets the federal standard. Reviewers are required to make evidence-based determinations, not assumptions or inferences. MaineDOT must make a defensible finding supported by facts in the record.

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### Slide 15 – Mistakes to Avoid

If an incident does not clearly identify who made the decision, what happened, when, and where it occurred, Reviewers cannot evaluate whether the event actually created a barrier. Common mistakes include missing who, what, when, or where; failing to link incidents to economic harm; not comparing outcomes to others; and relying on general hardship. Reviewers cannot assume or fill in missing information; it must be clearly stated in the narrative.

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### Slide 16 – Key Considerations

**Background & Upbringing:** Socioeconomic and community challenges; social or cultural barriers.

**Education & Employment:** Obstacles in schooling, underemployment, and unequal treatment at work.

**Financing & Capital Access:** Loan denials, high-cost credit, lack of collateral or wealth.

**Business Challenges:** Barriers to bidding, extra costs, unequal treatment by clients, institutions, or agencies.

**Measurable Economic Harm:** Lost revenue, extra costs, delayed growth; support with documentation.

**Comparison to Peers:** Show how others had easier access to capital, contracts, or opportunities.

**Tip:** Keep examples specific and concrete, and show how disadvantages shaped your path.

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### Slide 17 – Personal Net Worth Statement Overview

Each owner claiming social and economic disadvantage must submit a Personal Net Worth Statement. This form looks at the individual's finances, not the company's finances.

MaineDOT uses the PNW to help determine whether an owner meets the economic disadvantage criteria. Accuracy and completeness are critical; missing or inconsistent information can delay review or affect eligibility.

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### Slide 18 – Personal Net Worth Statement – What to Include & Common Issues

The PNW must list all personal assets and liabilities, supported by documentation when required.

Certain items, like ownership in the applicant firm and equity in a primary residence, are excluded under the regulations.

We frequently see delays caused by missing information, omissions, or figures that don't align with tax returns or other financial records. Reviewing the form carefully before submission can prevent unnecessary follow-up requests.

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### **Slide 19 – Final Tips for Applicants**

Be specific and factual. Clearly explain cause and effect. Focus on your personal experiences rather than general business challenges. Before submitting, review your narrative to ensure each example clearly connects an incident to economic harm. Applicants are highly encouraged to reread their narrative from a Reviewer's perspective.

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### **Slide 20 – Assistance and Support**

MaineDOT cannot write Personal Narratives for applicants. However, staff can explain requirements and answer procedural questions. Applicants are encouraged to contact the Civil Rights Office if they need clarification on what the regulation requires.

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### **Slide 21 – MaineDOT Civil Rights Office Staff**

This slide lists MaineDOT Civil Rights Office contacts. Applicants should feel free to reach out with procedural questions or for clarification on the requirements, but staff cannot assist with specific questions about your narrative or help with its creation.