

# Understanding the DBE Reevaluation Requirements

MaineDOT DBE / ACDBE Training  
49 CFR § 26.67

# What Is a Personal Narrative?

Written explanation of your own experiences of disadvantage:

- Required for DBE and ACDBE certification
- Each qualifying owner must submit a separate narrative

# Why MaineDOT Requires This Narrative

USDOT revised DBE rules effective October 3, 2025:

- No automatic presumption of disadvantage
- Applicants must affirmatively demonstrate disadvantage

# What the Law Requires (49 CFR § 26.67)

## Disadvantage must be shown by a preponderance of evidence

- ✓ Experiences must be chronic and substantial
- ✓ Disadvantage must result in material economic harm
- ✓ Applications may be denied if the personal narrative relies on race or sex, or does not demonstrate individualized, evidence-based disadvantage

# What MaineDOT Evaluates

## Personal experiences in the United States

- Barriers affecting education, employment, business, or capital
- Real economic or professional harm

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# Your Narrative Must Be About You



Focus on your individual experiences

- ✓ Business challenges only if tied to personal impact
- ✓ Do not submit a general business history



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# Describe Specific Incidents



**General statements are not  
enough**

- ✓ Each incident must be concrete and detailed
- ✓ Explain exactly what happened



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# What Details Each Incident Must Include



Who was involved

- What happened
- When and where it occurred
- Individual or organization involved





# Explain Why the Incident Was a Barrier

**What rule, policy, or action created the obstacle:**

- Why it was discretionary or unequal
- How did it limit your opportunity



# Demonstrate Material Economic Harm

## Lost income, contracts, or opportunities

- Lower pay or denied advancement
- Delayed business growth or higher costs



# Magnitude and Duration of Harm

Estimate the size of the loss to the extent possible

- Explain whether harm was short-term or ongoing
- Link harm directly to the incident

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## Compare to Similarly Situated Persons

Individuals with similar education or experience:

- Businesses of similar size, age, and industry
- Shows disadvantage vs. ordinary hardship



# Types of Experiences You May Include

- Education or training barriers
- Employment discrimination or exclusion
- Business ownership barriers
- Access to capital issues

# Examples That Do NOT Meet the Standard



## Vague statements

- ❖ Normal business risk
- ❖ Unsupported bias claims
- ❖ Group-based assumptions

# Mistakes to Avoid

**Missing who, what, when, or where**

- No link to economic harm
- No comparison to others
- Relying on general hardship



### KEY CONSIDERATIONS

Background & Upbringing	Education & Employment Barriers	Financing & Capital Access	Business Challenges	Measurable Economic Harm	Comparison to Similar Non-Disadvantaged Peers
Describe your socioeconomic background (e.g. low income, education, neighborhood conditions)	Define obstacles accessing higher education (e.g. limited access to financial resources, rejections, delayed enrollment)	Explain loan denials or increased interest rates/higher terms	Detail barriers to bidding, versus similarly situated competitors	Specify the impacts (e.g. lost revenue, extra costs, delayed growth)	Compare your path to non-disadvantaged peers with easier access to capital, contracts, or growth, and note additional challenges you faced
Discuss community issues (e.g. limited economic resources or opportunities)	Specify periods of underemployment or slower career advancement compared to peers	Outline insufficient collateral, credit history, or personal wealth to secure favorable financing	Highlight extra costs or delays that similarly situated peers did not incur (e.g. bonding, insurance, surety).	Provide financial statements, tax returns, net worth statements, credit reports, etc., to support the narrative.	Show by comparison how you were restricted or delayed compared to others starting in similar industries and/or regions
Outline your social barrier experiences (e.g. communication barriers, economic or cultural biases)	Detail unequal treatment in hiring, promotions, pay, benefits, or other employment conditions, including retaliation or discrimination	Explain any reliance on personal debt or high-cost credit to start or sustain your business	Note any unequal treatment in government or other work opportunities, including by clients, customers, or teaming partners during contracts or bidding	List specific contracts, clients, or opportunities you were unable to pursue or secure due to the described disadvantage	Describe how disadvantages impacted your ability to compete or advance in your industry compared to peers without similar barriers
These are prompts only to guide reflection on your experiences and how they contributed to social or economic disadvantage					



# Personal Net Worth Statement Overview

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Required for each  
disadvantaged owner

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Reflects individual, not  
business, financial condition

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Used to evaluate economic  
disadvantage

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Must be complete, accurate,  
and current

# Personal Net Worth What to Include & Common Issues

## Include:

- Assets (cash, real estate, investments, retirement accounts)
- Liabilities (loans, credit cards, mortgages)

## Exclude:

- Ownership interest in the applicant firm
- Equity in primary personal residence (as allowed by regulation)

## Common Issues:

- Missing documentation
- Undisclosed assets or debts
- Inconsistencies with tax returns or financial records

# Final Tips for Applicants

## Be specific and factual

- ✓ Explain cause and effect
- ✓ Focus on personal experiences
- ✓ Review before submitting
- ✓ Ensure your Personal Net Worth Statement is complete
- ✓ Review all submissions for consistency and accuracy

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# Assistance and Support



**MaineDOT cannot write narratives:**

- Staff can explain requirements
- Contact the Civil Rights Office with questions



# MaineDOT Civil Rights Office Staff

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