

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

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



Describe Specific Incidents



**General statements are not
enough**

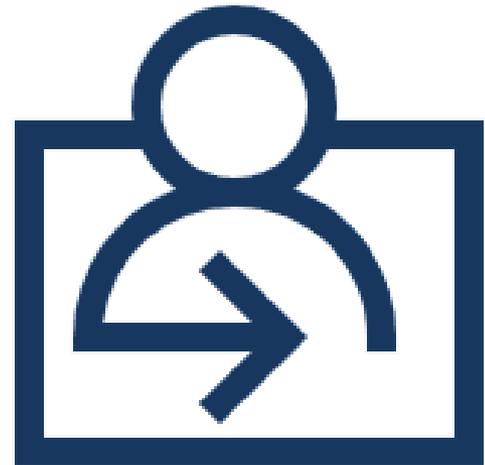
- ✓ Each incident must be concrete and detailed
- ✓ Explain exactly what happened



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

Compare to Similarly Situated Persons

Individuals with similar education or experience:

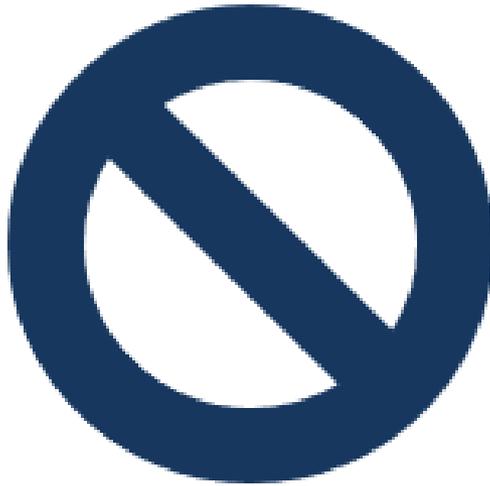
- Businesses of similar size, age, and industry
- Shows disadvantage vs. ordinary hardship



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



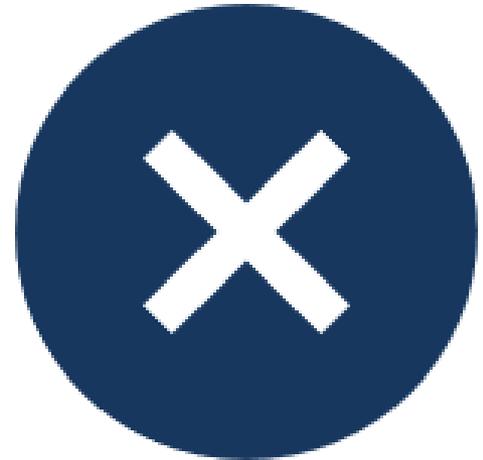
Vague statements

- ❖ 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

Required for each
disadvantaged owner

Reflects individual, not
business, financial condition

Used to evaluate economic
disadvantage

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

Assistance and Support



MaineDOT cannot write narratives:

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



MaineDOT Civil Rights Office Staff

Sherry Tompkins, Director

Sherry.Tompkins@maine.gov

207-624-3066 or 207-592-0686

Mary Bryant, DBE Program Administrator

Mary.bryant@maine.gov

207-624-3056 or 207-446-2453

Amy McCann, EEO Officer

Amy.mccann@maine.gov

207-624-3065 or 207-557-3461

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.