



WHAT YOUR PERSONAL NARRATIVE NOW HAS TO SHOW

A checklist for DBE and ACDBE owners on what the Final Rule (91 FR 60885) requires

THE DATES

- Certifying agencies must **complete reevaluations by December 24, 2026**. An agency may receive one extension of up to 90 days.
- If your firm has not submitted its personal narrative and personal net worth statement by your agency's date, you receive a **written notice of nonresponse**.
- You then have **until March 24, 2027** (or 90 days after an extended deadline) to submit. After that, the firm is **disqualified**.

Has your state finished its reevaluation? [See USDOT's state-by-state status](#).

WHAT THE NARRATIVE MUST SHOW NOW

New or changed in the Final Rule of September 25, 2026.

- ☐ **An objective distinguishing feature. New.** At least one identifiable status or condition, described in enough detail to show it led to the hardship, barriers, or denied opportunities.
- ☐ **The right comparison. Changed.** Compare yourself with **non-disadvantaged individuals with comparable qualifications** (credentials and work history), no longer "similarly situated" persons.
- ☐ **Social barriers, and not every category. Changed.** Show economic hardship, **social** barriers, **or** denied opportunities. "Systemic barriers" is gone, and you do not need all three.
- ☐ **Your own experiences of discrimination, as events. Changed.** That includes race or sex discrimination. What the rule rejects is a presumption: race or sex alone establishes nothing.
- ☐ **Finances that tell one story. Changed.** Even under the net worth cap, a certifier with a reasonable basis may find you not economically disadvantaged in fact, looking at assets, income, and access to credit.

WHAT DOESN'T CHANGE

Still required, as under the interim rule of October 3, 2025.

- ☐ **Specific instances, not general statements.** Individualized proof, by a preponderance of the evidence, of what held back your progress in **education, employment, or business, including obtaining financing**.
- ☐ **The economic harm, with its type and magnitude.** How, and to what extent, those impediments cost you economically.
- ☐ **Your personal net worth statement, attached** to the narrative.

HOW GHN ORGANIZES IT

STEP	WHAT IT COVERS IN THE RULE
1. The qualifying event	The specific instances, and the objective distinguishing feature
2. The impediment	Economic hardship, social barriers, or denied opportunities, compared with peers of comparable qualifications
3. The economic impact	The economic harm, its type and magnitude

IF YOU WANT HELP

Already have a draft, already submitted, or got questions back from your agency? **Book the 45-minute Triage**: a paragraph-by-paragraph review.

Starting from scratch? **Book the 90-minute Intensive**: we build the draft with you from your own facts.

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