



Department of Social and Economic Mobility DBE/ACDBE Personal Narrative Guidance

Updated: October 9, 2026

Background

The Maryland Department of Social and Economic Mobility, established under House Bill 1253 (Chapter 605, Laws of Maryland 2025), is the principal department of State government and the first cabinet-level agency in the United States dedicated to removing structural barriers to social and economic mobility.

Effective October 1, 2025, three existing State offices focused on social equity programming have been consolidated into a single, integrated department. Specifically, the Department of Social and Economic Mobility is now composed of:

- the Office of Minority Business Enterprise;
- the Office of Small, Minority, and Women Business Affairs; and
- the Office of Social Equity.

This consolidation enables the State to better coordinate equity initiatives, increase operational efficiency, and promote economic opportunity for all Marylanders.

The Office of Minority Business Enterprise (OMBE) will continue to serve as Maryland's certification entity for the Minority Business Enterprise (MBE) Program, the Disadvantaged Business Enterprise (DBE) Program, the Airport Concession Disadvantaged Business Enterprise (ACDBE) Program, and the Small Business Enterprise (SBE) Program.

Introduction

On October 3, 2025, the U.S. Secretary of Transportation issued an Interim Final Rule (IFR), entitled "Disadvantaged Business Enterprise Program and Disadvantaged Business Enterprise in Airport Concessions Program Implementation Modifications." The IFR became effective upon publication in the Federal Register, and is available at: <https://www.federalregister.gov/d/2025-19460>.

On September 25, 2026, USDOT published a Final Rule, entitled "Disadvantaged Business Enterprise and Airport Concession Disadvantaged Business Enterprise Program Revisions," which adopts the IFR with several modifications. The Final Rule became effective upon publication in the Federal Register, and is available at: <https://www.federalregister.gov/documents/2026/09/25/2026-19688/disadvantaged-business-enterprise-and-airport-concession-disadvantaged-business-enterprise-program>.

The Final Rule does not affect a firm’s MBE certification, which applies to state-funded contracts. However, the IFR, as modified by the Final Rule, makes significant changes to the DBE and ACDBE programs, including:

- Elimination of Presumptions: Certification agencies that are responsible for administering Unified Certification Programs (UCP), such as OMBE, are now prohibited from using race- and sex-based presumptions of social and economic disadvantage for purposes of DBE/ACDBE certification. Instead, DBE and ACDBE applicants must affirmatively demonstrate social and economic disadvantage based on their own experiences and circumstances, by relating specific instances of economic hardship, social barriers, or denied opportunities that impeded the owner’s progress or success in education, employment, or business. This requirement applies to individuals who are Native American, Native Hawaiian, or Alaska Native and who individually own their firms. It does not apply to firms owned by Indian Tribes, Native Hawaiian Organizations, or Alaska Native Corporations, which remain subject to certification provisions of 49 CFR §26.63(c).
- Mandatory Reevaluation of Certified DBEs/ACDBEs: All previously certified DBEs and ACDBEs must undergo a mandatory reevaluation under the new standards set forth in the IFR, as modified by the Final Rule. Firms will need to submit new documentation, including a personal narrative and a current personal net worth statement, to their original certifying agency. Certifiers must then determine each firm’s eligibility and issue a written decision either retaining the firm as a DBE/ACDBE or disqualifying it from the program. The Final Rule requires UCPs to complete the reevaluation process by December 24, 2026, subject to a one-time extension of up to 90 days. Firms that have not submitted a personal narrative and personal net worth statement by the time the UCP completes its reevaluation will receive a written notice of nonresponse and must submit the required materials by March 24, 2027. Firms that fail to submit by the applicable deadline will be automatically disqualified.
- Suspension of DBE Goals: Until a UCP completes its reevaluation process, recipients of USDOT funding cannot set contracting goals for DBEs or ACDBEs or count any participation toward overall goals.

Under the Final Rule, personal narratives submitted by DBE and ACDBE firms must establish “the existence of disadvantage by a preponderance of the evidence based on individualized proof regarding specific instances of economic hardship, social barriers, or denied opportunities that impeded the owner’s progress or success in education, employment, or business, including obtaining financing on terms available to non-disadvantaged individuals with comparable qualifications.”

The Final Rule also requires that each personal narrative (1) identify at least one objective basis for the owner’s disadvantaged status—an “objective distinguishing feature” (ODF), which may be any identifiable status or condition—and describe it in sufficient detail to justify the owner’s conclusion that it prompted the economic hardship, social barriers, or denied opportunities the owner experienced; and (2) state how and to what extent those impediments caused the owner economic harm, including a full description of the type and magnitude of that harm. The owner must also include a current personal net worth statement and any other financial information the owner considers relevant.



In addition, even where an owner's personal net worth falls below the regulatory cap, OMBE may determine that the owner is not economically disadvantaged in fact when compared to non-disadvantaged individuals with comparable qualifications, based on the owner's assets, income, access to credit and capital, and other relevant circumstances.

In order to help previously certified firms participate in the reevaluation process, and to support new applicants for DBE and/or ACDBE certification, OMBE is providing the guidance below to assist in relating personal and professional experiences that can be included in their individualized personal narratives. This guidance also describes the option available to previously certified firms that do not wish to remain in the DBE or ACDBE program.

Option to Withdraw from the DBE/ACDBE Program

A previously certified DBE or ACDBE firm that does not wish to maintain its DBE or ACDBE certification may voluntarily withdraw from the program—or "opt-out" of the reevaluation process—rather than submit a personal narrative and personal net worth statement. To withdraw, the firm's majority owner(s) must submit a written request to OMBE at mbe.dosem@maryland.gov that identifies the firm by name and certification number and states whether the firm is withdrawing from the DBE program, the ACDBE program, or both. Firms considering withdrawal should note the following:

- Withdrawal from the DBE or ACDBE program does not affect any other certification the firm holds through OMBE or DoSEM, including MBE or SBE certification.
- Upon receipt of a complete request, OMBE will acknowledge the withdrawal in writing and remove the firm from the Maryland DBE/ACDBE directory. A firm that withdraws will not be reevaluated and will not receive a notice of non-response.
- Where Maryland is the firm's jurisdiction of original certification, withdrawal will affect any DBE or ACDBE certification the firm holds in another state based on its Maryland certification.
- A firm that withdraws may later seek DBE or ACDBE certification by submitting a new Uniform Certification Application, together with a personal narrative and current personal net worth statement, and will be evaluated under the eligibility standards then in effect.
- A firm that neither submits the required materials for reevaluation nor withdraws by the applicable deadline will be disqualified, as described above.

OMBE does not encourage or discourage withdrawal. Firms that remain interested in DBE or ACDBE certification are urged to participate in the reevaluation process using the guidance below.

Instructions

You may—but are not required to—use the framework provided below as guidance to help structure your personal narrative. **Use of this framework does not ensure that your firm will receive a favorable determination in the reevaluation or certification process.** In general, your personal narrative should:

- Be based on your own experiences and circumstances within American society.



- Identify at least one objective distinguishing feature (ODF)—an identifiable status or condition that forms the basis of your disadvantaged status (*e.g.*, a disability, including a service-connected disability, or a personal characteristic on account of which you experienced discrimination)—and describe it in sufficient detail to show how it prompted the economic hardship, social barriers, or denied opportunities you experienced.
- Not rely simply on your race, sex, or association with a historically disadvantaged group to show social and economic disadvantage, though specific, individual experiences of discrimination, including instances of discrimination based on race, sex, or association with a historically disadvantaged group, may be included.
 - Note that, consistent with the Final Rule, OMBE does not and will not use race- or sex-based presumptions of social and economic disadvantage. As such, identifying your race, sex, or association with a certain demographic group is not enough to show social and economic disadvantage. As the Final Rule clarifies, specific, individual experiences of discrimination—including discrimination based on race, sex, or association with a historically disadvantaged group—may support a claim of social and economic disadvantage, but it is important that the narrative relate those specific, individual experiences, and not rely simply on group association.
- Describe specific incidents of economic hardship, social barriers, or denied opportunities (including dates, context, and outcomes), and explain how each incident relates to your ODF.
- Show how and to what extent these experiences caused economic harm or limited your ability to succeed in your career, education, or business including a full description of the type and magnitude of that harm.
- Compare your experiences to those of non-disadvantaged individuals with comparable or lesser qualifications (*e.g.*, similar education, credentials, industry, and work experience) who did not share your ODF.

Personal Narrative Framing:

A. General Information – Provide general information about you and your firm.

1. Your Name
2. Firm Name
3. Industry/Trade
4. Date Business Started
5. Principal Business Address
6. Additional Firm Addresses

B. Objective Distinguishing Feature (ODF) – Identify at least one objective basis for your disadvantaged status. Your ODF may be any identifiable status or condition.

- What is your ODF? Describe it in sufficient detail for a reviewer to understand the status or condition and how it applies to you.

- Explain why you believe this ODF prompted the economic hardship, social barriers, or denied opportunities described in the sections that follow.
- If more than one ODF applies, identify each one and the incidents associated with it.

C. Description of Social Disadvantage – Describe the specific economic hardship, social barriers, or denied opportunities that you faced because of your ODF.

1. **Who** was involved? (identify the person(s) or organization(s) responsible, if known)
2. **What** happened? (describe the action or event in detail)
3. **When** did it happen? (provide a specific timeframe)
4. **Where** did it happen? (identify the institution, organization, or setting)
5. **Why** do you believe it happened? (explain how the incident was connected to your ODF)
6. **How** did it impact you and your financial success? (explain the impact the incident(s) had on your career, employment, and/or business)

If applicable, provide multiple examples.

D. Impact on Your Education, Career, or Business – Explain how your social disadvantages from the previous section impacted your education, career, and/or business. Consider whether there was an impact on the following:

1. Education or Training Opportunities
 - Have you personally experienced barriers that limited your access to education, professional training, or certifications? (*e.g.*, financial obstacles, exclusion, lack of mentorship, or bias)
 - How did these barriers affect your ability to qualify for jobs, licenses, or business opportunities?
2. Employment and Career Progression
 - Were you treated differently in hiring, pay, or promotions compared to non-disadvantaged individuals with comparable or lesser qualifications?
 - Did you face exclusion from professional networks or leadership opportunities?
 - Were there recurring barriers that prevented advancement despite performance or experience?
3. Business Ownership and Access to Opportunities
 - Have you experienced denial or exclusion from contracts, partnerships, or procurement systems where non-disadvantaged individuals with comparable or lesser qualifications were accepted?
 - Have you faced unequal or discriminatory treatment by lenders, prime contractors, or procurement officials?

- Were you excluded from informal business circles, supplier networks, or mentoring programs?

4. Access to Financing or Capital

- Describe barriers you have personally faced in obtaining business loans, bonding, or insurance on terms available to non-disadvantaged individuals with comparable or lesser qualifications.
- Include when and where this occurred, who made the decision, what the outcome was, and how it affected your business.
- Explain how these experiences limited your ability to start, grow, or sustain your business.

E. Magnitude and Type of Economic Harm – Detail how the experience(s) explained above impacted your financial well-being and/or the financial well-being of your firm.

- Explain how these experiences resulted in measurable financial harm or delayed progress for your business.
- Examples include lost contracts, higher costs, delayed expansion, or reduced revenue or capacity.
- Describe the type and magnitude of the impact as fully as possible—quantifying it where you can—and note whether the effects are ongoing or have since been mitigated.

F. Supporting Documentation – Consider the following types of supporting documents to include as *optional attachments* to your personal narrative. This list is non-exhaustive, and you may include other types of documents you believe are relevant.

1. Loan Denial Letters
2. Employment Records
3. Medical or Legal Documents
4. Witness Statements
5. Financial Statements
6. Emails Or Written Communication
7. Educational and Professional Credentials

QUESTIONS TO CONSIDER:

Below are some additional questions to help prompt your thinking about specific experiences you have had and how those experiences have led to you being socially and economically disadvantaged.

Background & Upbringing	Education & Employment Barriers	Financing & Access to Capital	Business Challenges	Quantification of Harm	Relative or Other Non-Disadvantaged Individuals
What is your socioeconomic background (e.g. low income, parental education, neighborhood conditions)?	Did you face obstacles in accessing higher education (e.g. needing to work full time, limited access to financial aid, rejections, delayed enrollment, social pressures to pursue a different field/profession)?	Have you ever been denied a loan or faced increased interest rates / higher terms (bank, SBA, private)?	When you started your business (or earlier), did you face hurdles (e.g. inability to bid, lack of contracts, exclusion from networks) compared to peers with comparable or lesser qualifications?	Can you describe the magnitude of disadvantage (lost revenue, extra costs, delayed growth)?	Do you know of peers (non-disadvantaged) who had easier access to capital, contracts, or growth? How was your path more difficult?
Did you grow up in a community with limited resources (e.g. low income, lack of opportunities)?	Were there periods of underemployment or difficulty advancing in your career compared to peers?	Did you lack collateral, credit history, or personal wealth to secure favorable financing?	Did you incur extra costs or delays (bonding, insurance, surety) that others did not have to absorb?	Do you have financial statements, tax returns, net worth statements, credit reports, etc., to support the narrative?	Can you show, by comparison, how you were restricted or delayed relative to others starting in similar industries or regions?
Did you experience any social barriers (e.g. language barriers or cultural biases)?	Have you experienced unequal treatment in hiring, promotions, and other aspects of professional advancement, pay and fringe benefits, terms and conditions of employment, or retaliatory or discriminatory behavior by any employer?	Did you have to rely on personal debt, family, or high-cost credit to start or sustain your business?	Have you experienced unequal treatment in opportunities for government contracts or other work or unequal treatment by clients/customers or teaming partners for a contract or bidding opportunity?	Were there specific contracts, clients, or opportunities you were unable to pursue or secure because of these disadvantages?	How have these disadvantages impacted your ability to compete or advance in your industry compared to peers without similar barriers?