

FAQs

DBE / ACDBE Reevaluation Process

1. Why is TDOT conducting a reevaluation of DBE and ACDBE firms?

Effective October 3, 2025, the U.S. Department of Transportation revised 49 CFR § 26.67, changing how social and economic disadvantage must be evaluated. These changes require TDOT to reevaluate all TN-based DBE and ACDBE firms under the updated standards.

2. Who must participate in the reevaluation?

Every individual whose ownership and control make up at least 51% of a TN-based DBE or ACDBE firm must complete the reevaluation. If multiple owners meet this threshold, each must submit their own materials.

3. What materials must be submitted?

Each qualifying owner must provide:

- A Personal Narrative of Social and Economic Disadvantage
- A Personal Net Worth (PNW) Statement

4. What is the Personal Narrative of Social and Economic Disadvantage?

The Personal Narrative is a written account of your individual experiences of social and economic disadvantage in the United States. TDOT provides a standardized questionnaire to help owners:

- Identify specific incidents occurring in the U.S.
- Explain how those incidents delayed, disrupted, denied, or otherwise impeded access to education, employment, or business opportunities
- Demonstrate material economic harm
- Compare outcomes to similarly situated, non-disadvantaged individuals

General business challenges, market conditions, or assumptions based solely on group identity do not meet federal standards.

5. Is there still a presumption of social or economic disadvantage?

No. The revised regulations eliminate all group-based presumptions. Each qualifying owner must individually demonstrate social and economic disadvantage. Submissions should focus on personal experiences and barriers *unrelated to race or gender*. TDOT evaluates eligibility based on a preponderance of the evidence.

6. Can TDOT help me write or edit my Personal Narrative?

No. TDOT cannot write, edit, or advise on the substance of your Personal Narrative or financial materials. Staff **cannot** suggest what experiences to include, how to describe them, or how to

frame your narrative. TDOT **can** review your submitted narrative and provide regulatory feedback, such as identifying where additional detail, clarification, or required elements are needed to meet the preponderance standard. This feedback is limited to pointing out gaps or insufficiencies and does not involve shaping or rewriting your narrative.

7. What guidance is available for preparing the Personal Narrative?

TDOT's detailed Questionnaire outlines specific prompts to help owners describe the education, employment, and business barriers they faced and how those barriers differed from those experienced by similarly situated, non-disadvantaged individuals.

8. What is the purpose of the Personal Net Worth (PNW) Statement?

The PNW Statement is used to determine whether an owner meets the economic eligibility requirements of the DBE and ACDBE programs. TDOT reviews the statement and supporting documentation to verify assets, liabilities, and overall net worth. The net-worth cap is \$2,047,000, excluding the value of the primary residence and ownership interest in the applicant business.

9. How do I submit the required documents for reevaluation?

TDOT now manages its DBE Program through the **B2Gnow** web portal. All required documents — including revisions and supplemental materials — must be uploaded at tdot.gov2g.com. Access instructions [here](#).

10. What happens if my submission is incomplete or lacks detail?

If TDOT cannot make a determination based on the information provided, you may receive a notice of deficiencies and an opportunity to submit additional materials. If deficiencies remain unresolved, TDOT cannot continue your participation in the DBE program, and you will need to reapply later.

11. How long will the reevaluation process take?

Timelines depend on submission completeness and the volume of reevaluations. TDOT will issue determinations as efficiently as possible once all required materials are received. The goal is to complete reviews and provide feedback or final decisions by **June 15, 2026**.

12. What if my firm does not meet eligibility requirements after reevaluation?

If TDOT determines that a firm no longer meets eligibility requirements, the firm will receive written notice along with information about applicable appeal or reconsideration rights under federal regulations.

13. Will my approved NAICS codes change as part of the reevaluation?

Your firm remains certified only for the NAICS codes previously approved by TDOT. Requests to add or modify NAICS codes must be submitted separately with supporting documentation.

14. Is TDOT offering informational sessions?

Yes. TDOT's Supportive Services and compliance staff hosted an informational for TN-based DBE and ACDBE firms to review the reevaluation process and answer general questions on Friday, March 13. If you were unable to attend, please email TDOT.DBE.Program@tn.gov to request access to the recorded video

15. What can I expect after my firm is approved during the reevaluation process?

Once your firm is approved, SBDP will review all submissions and aims to provide feedback or approvals by June 15 so that we can forward the full reevaluation package to USDOT for federal approval. While June 15 is not a required submission deadline for DBEs, timely cooperation from firms helps us expedite USDOT's review. Once federal approval is received, we will resume DBE goal setting and all remaining program activities.

16. Who can I contact with additional questions?

For procedural questions about the reevaluation process, deadlines, or required forms, contact David Neese in the TDOT Civil Rights Division at TDOT.DBE.Program@tn.gov.