

Small Business Certification & Compliance Essentials

March 10, 2026





**Equal
Opportunity
Department**

**ACDBE/DBE FEDERAL PROGRAM
2025 REEVALUATION BASICS**

A PHX Small Business Resource Session



INTERIM FINAL RULE

On October 3, 2025, U.S. Department of Transportation (USDOT) issued an **Interim Final Rule (IFR)**.

Key Change for Certification:

- No more automatic assumptions based on race or gender.
- Every applicant must show proof of social and economic disadvantage individually.



MEMBERS OF THE AZUCP



E-blast sent by **AZUCP**

The purpose of this letter is to provide guidelines to all Disadvantaged Business Enterprise (DBE) and Airport Concessions Disadvantaged Business Enterprise (ACDBE) firms regarding the mandatory reevaluation for DBE certification under the new Interim Final Rule (IFR). The 2025 reevaluation application is now available in the online portal, and you can submit your application NOW!



DBE/ACDBE 2025 REEVALUATION APPLICATION GUIDELINE UPDATES

New Interim Final Rule (IFR) requires all DBE/ACDBE firms to complete **mandatory recertification**.

- The **2025 reevaluation application** is now available in each agency's online portal.
- **AZUCP reevaluation period ends [March 31, 2026](#)**.
- Applications submitted after this date may still be reviewed for eligibility.
- Firms that have not applied should submit **as soon as possible** to ensure timely processing.
- If you have concerns or do not plan to apply, contact your certifying agency using the **Questions Related to the IFR Form**.
- Recertification under IFR standards is **required** for continued DBE/ACDBE eligibility.





ADOT, City of Phoenix, City of Tucson, and all certifying agencies nationwide must **immediately implement** the new USDOT Interim Final Rule (effective Oct. 3, 2025). Full rule and guidance available at **USDOT website**.

IFR Implementation Notice: Key changes under the new USDOT rule include:

- All DBE firms must complete mandatory recertification, known as reevaluation, through the Arizona Unified Certification Program (AZUCP), as quickly as possible
 - Submit your reevaluation application to the agency that manages your DBE certification records - ADOT, the City of Phoenix and the City of Tucson.
- Each firm must submit two required documents: a current Personal Net Worth (PNW) Statement and a Personal Narrative (PN).



INSTRUCTIONS TO SUBMIT THE 2025 REEVALUATION APPLICATION

Log in to your account as usual and select “2025 Reevaluation Application.”
Please ensure the following:



PERSONAL NARRATIVE (PN) – KEY GUIDANCE



- Each qualifying owner must submit a PN showing **personal disadvantage** with specific examples (economic hardship, barriers, denied opportunities, difficulty accessing financing, etc.).
- PN must clearly connect **three elements**: **Instance** → **Impediment** → **Harm**
- Describe **at least one situation** where disadvantage occurred, the barrier it created, and the harm that resulted.
- Use **evidence when available** (denial letters, records, or clear recollection with context).
- Show how these experiences **impacted your business path** (delayed education, higher costs, missed opportunities, limited networks)

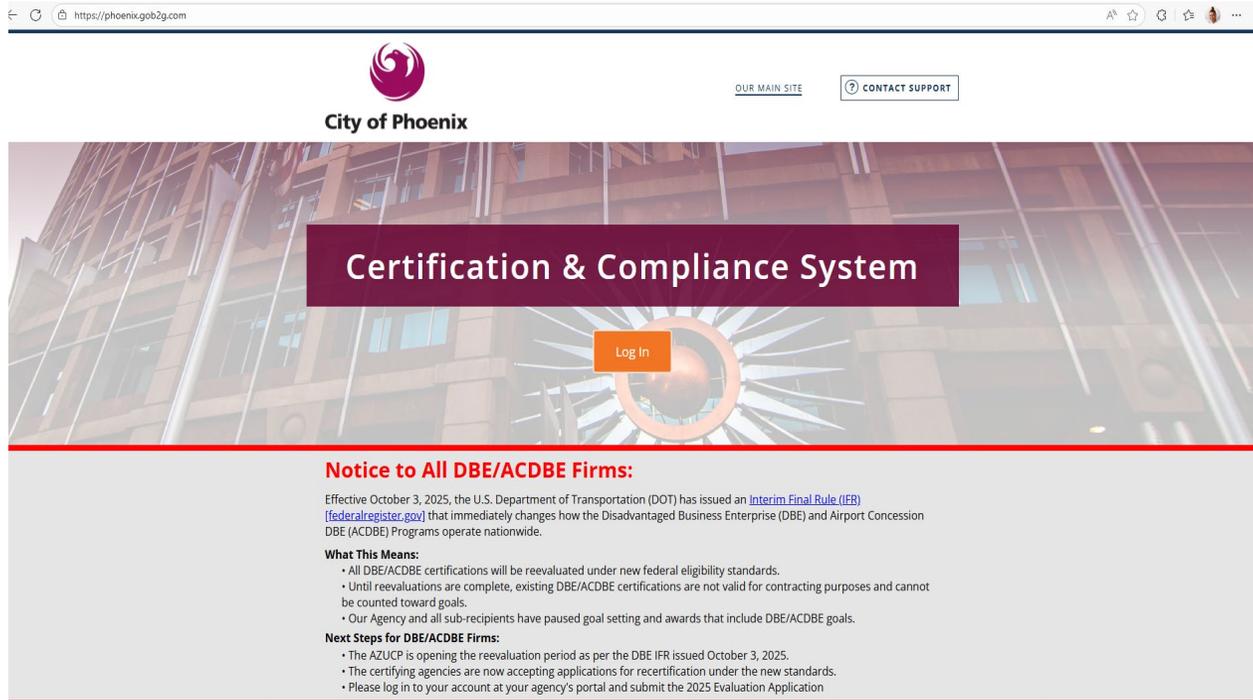
PN + PNW together determine AC/DBE eligibility



REMINDERS

- Your PN has no required length but must show disadvantage by a **preponderance of evidence**.
- Eligibility is **no longer based on race or sex**.
- If you do **not** plan to apply for recertification, notify your certifying agency.
- All firms seeking recertification should submit applications **as soon as possible**. Failure to submit may result in **decertification**.





Online Certification Application New URL

<https://phoenix.gob2g.com>

Contact Us

Phone: 602-262-6790

Email:

brd.certification@phoenix.gov





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NAVIGATING SMALL BUSINESS VERIFICATION

A PHX Small Business Resource Session



KEEPING OPPORTUNITIES OPEN FOR SMALL BUSINESSES

DBE/ACDBE certification are being reevaluated

- All DBE and ACDBE firms must go through reevaluation under the new standards to retain certification.

While reevaluation is being accomplished by the AZUCP, PHX remains committed to:

- ✦ Using ACDBE-Neutral measures to achieve Small Business Participation.
- ✦ A national market for small business participation.



WHY SMALL BUSINESS VERIFICATION?

It is a way to confirm small business status for airport small business opportunities.

The City defines a small business as any business:

- Whose annual gross income does not exceed the Small Business Administration's (SBA) **size standards** (13 CFR Part 121).
- That owners do not exceed the Personal Net Worth cap of **\$2.047 Million**.



SBA size standards table



DOCUMENTS

Documents needed to confirm your business is “small”:

- ✦ **Business Tax Returns** (or personal tax returns if filing a Schedule C for Sole Proprietorship)
- ✦ **Personal Net Worth (PNW) Statement**

Verification of small business status will be performed by the
City of Phoenix Equal Opportunity Department



REMEMBER

A Small Business does NOT have to be **certified** to be a part of a team

ACDBE  DBE
 **VERIFIED**

but it does have to be *verified**!

*Firm can not exceed the Small Business Administration's size standards and/or Owners cannot exceed the Personal Net Worth cap of \$2.047 Million



GOAL

Ensure fairness and **keep opportunities** open for small businesses at our City's airports.



EOD SMALL BUSINESS SUPPORT CONTACTS

For additional information, please contact the Equal Opportunity Department - Business Relations Division

Compliance Team: 602-495-0887

Via email: brd.compliance@phoenix.gov



Certification Team: 602-262-6790

Via email: brd.certification@phoenix.gov



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REEVALUATION BASICS & NAVIGATING SMALL BUSINESS VERIFICATION

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QUESTIONS



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