
Pennsylvania Unified Certification Program (PA UCP)

Webinar

*Disadvantaged Business Enterprise
(DBE)/Airport Concessions DBE
(ACDBE)
Certification Reevaluation*



December 10, 2025

Agenda

3:30 pm – Welcome, Opening Remarks, and Introductions

3:35 pm – Overview of the Pennsylvania Unified Certification Program (PA UCP)

3:40 pm - Understanding USDOT DBE/ACDBE Reevaluation Requirements

4:05 pm – PA UCP Reevaluation Schedule

4:10 pm - Questions and Answers

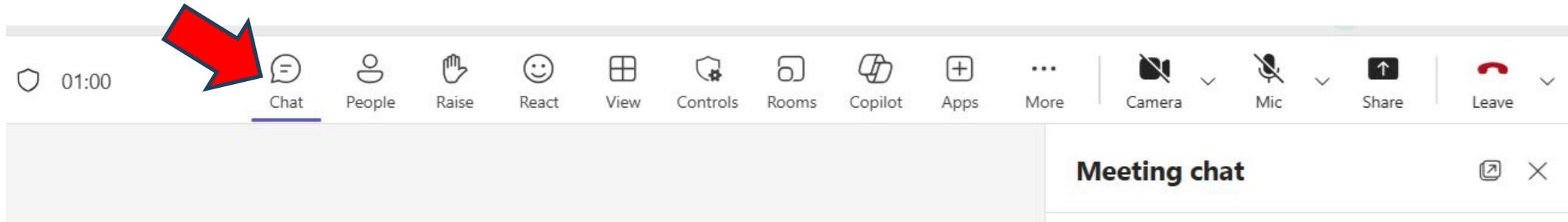
4:25 pm - Closing Remarks



How to Ask Questions For The Q&A Session

Please use the 'Chat' to type and submit your questions.

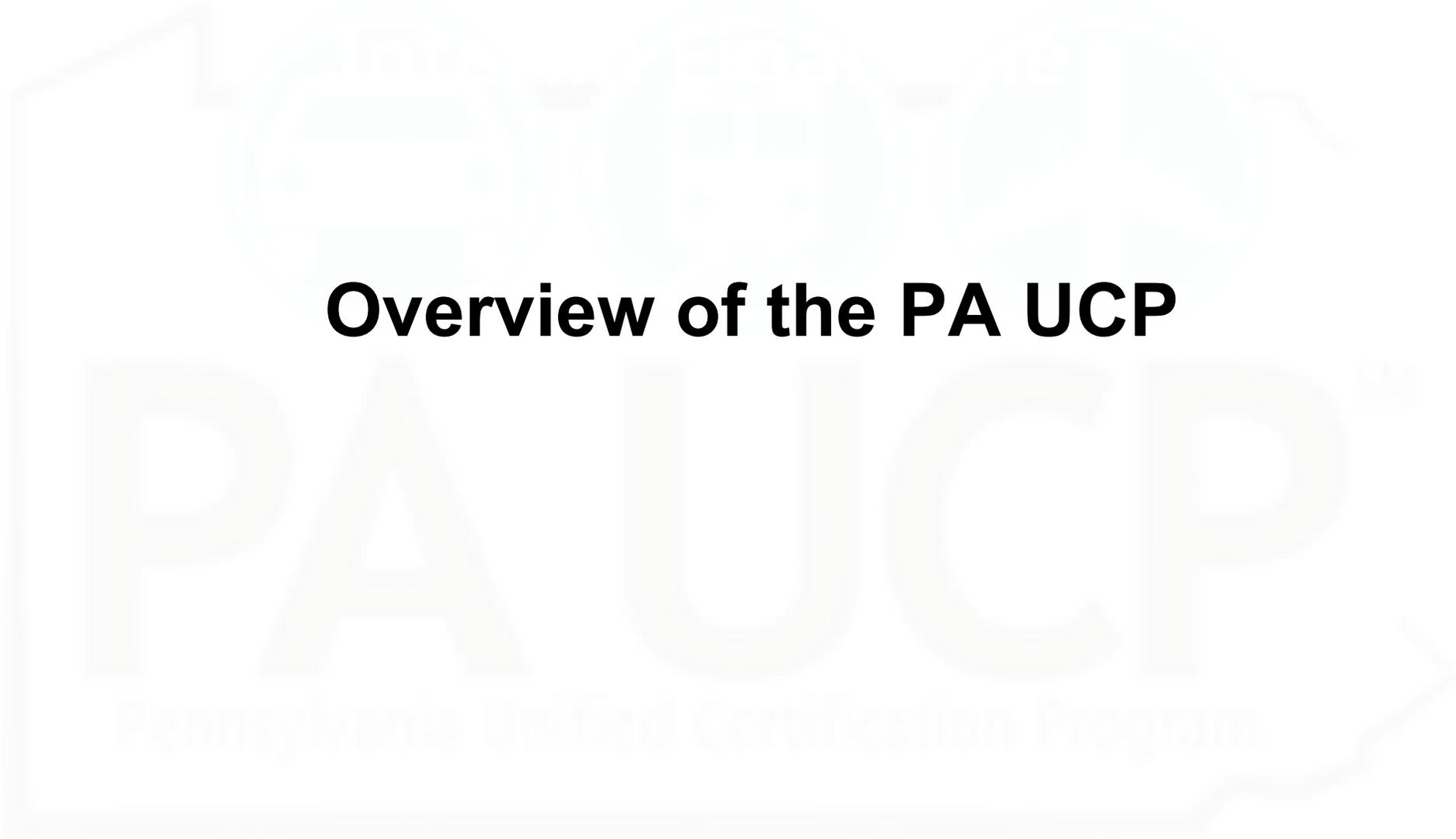
Our Team will answer as many of them as possible during today's webinar.



Welcoming, Opening Remarks, and Introductions

PAUCPSM

Pennsylvania Unified Certification Program



Overview of the PA UCP

Unified Certification Programs (UCP)

- Since 2002, USDOT recipients within each state were required to establish a UCP within that state (26.81)
 - UCPs make DBE/ACDBE certification decisions for each state
 - Each state's UCP is uniquely organized
 - ✓ Guided by an agreement signed by all USDOT recipients in the state
 - ✓ Can include one or more certifying entities
 - ✓ The PA UCP has 5 certifying members



- Each currently-certified DBE/ACDBE is assigned one of the five certifying agencies
 - This is the agency that primarily communicates with DBEs/ACDBEs about certification issues
- The PA UCP uses a software program (B2GNow) to facilitate certification processes and to provide a secure platform for information and document exchange
 - <https://paucp.dbesystem.com/>
 - This is also the system where primes (and others) locate certified businesses



- The certification platform is username- and password-protected
 - If you have misplaced your log-in information, you can retrieve it from within the system
- Review your firm's profile in the system to ensure that the information is up-to-date
- Ensure that your email system or firewall is not blocking communications from this system



Pennsylvania Unified Certification Program

Notice to All DBE/ACDBE Firms:

Effective October 3, 2025, the United States Department of Transportation (USDOT), Office of Civil Rights, published a DBE/ACDBE Interim Final Rule (IFR). As a result of the IFR, there are changes to the DBE/ACDBE program that have caused us to pause the certification process. Therefore, we are not accepting new DBE/ACDBE certification applications or DOEs at this time.

To determine if a firm is currently DBE and/or ACDBE certified and/or to verify a firm's NAICS codes, please refer to the online DBE Directory.

The Directory is updated in real-time and contains a complete list of all certified firms. If a firm is not in the DBE Directory, it means that the firm is not currently certified. The Stakeholder Letter (under "Additional Info") provides more information.

Disclaimer: Certification and the information listed within this directory is not a guarantee of a firm's capacity or ability to perform specific tasks or services. Users of this information are advised to conduct their own due diligence when engaging any listed entities. Prior to contracting, it is the prime contractor's responsibility to ensure a subcontractor is ready, willing and able to perform the defined scope of work.

Vendor Certification

Search our database of DBE/ACDBE certified vendors

Search for Certified Firms

Additional Info

System Training

Learn how to fully utilize our system with a live trainer

Training and Events

About the System

Welcome to the Pennsylvania State Unified Certification Program (PAUCP) Certification Portal! The PAUCP is responsible for DBE/ACDBE certification in the state of Pennsylvania and provides firms with "one-stop" shopping.

To apply for DBE/ACDBE certification you may contact any one of the five PAUCP Certifying Partners - SEPTA, Pennsylvania Department of Transportation, Allegheny County, Philadelphia International Airport, and Pittsburgh Regional Transit- by clicking on their logo.

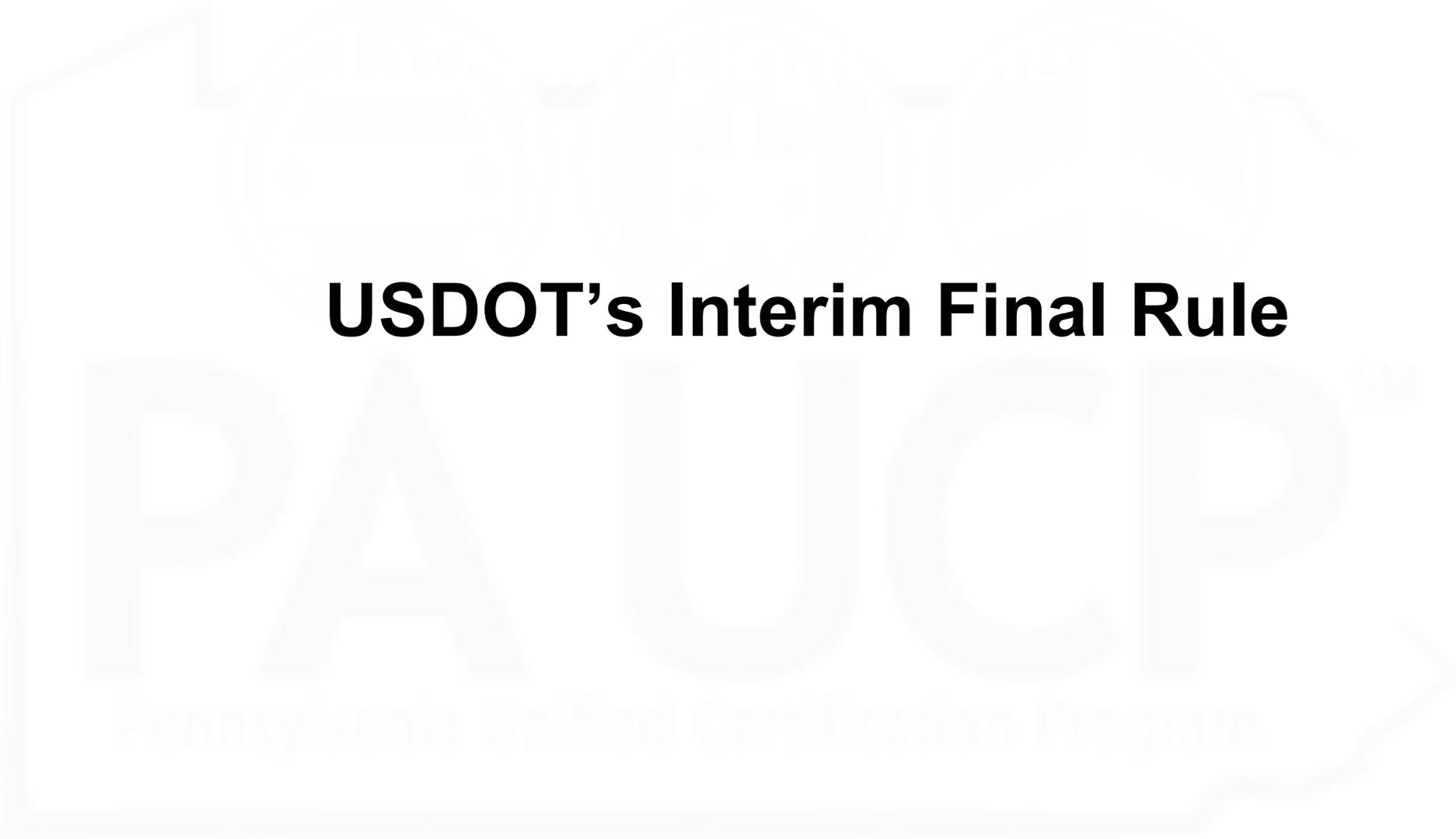
Get DBE Certified or Manage your DBE Certification

Click on a partner logo to apply or manage (e.g. request code expansion, submit annual affidavit) your certification. If your firm is applying for the first time, you may apply with any of the certifying partners listed below. Previous applicants must submit to the partner you originally applied with.









USDOT's Interim Final Rule

Key Dates for the Interim Final Rule (IFR)

Official Frequently Asked Questions (FAQs) on the U.S. Department of Transportation's Disadvantaged Business Enterprise Program and Disadvantaged Business Enterprise in Airport Concessions Program Implementation Modifications, October 3, 2025, Interim Final Rule

Updated December 1, 2025

The General Counsel of the Department of Transportation has reviewed these questions and answers and approved them as consistent with the language and intent of 49 CFR Part 26. The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

A. General

1. When did the Interim Final Rule (IFR) become effective?

The IFR was published in the Federal Register on October 3, 2025 and became effective that day.

2. By when must the recipients update their DBE program plans?

In accordance with § 26.21(b), significant changes to DBE plans must be submitted to DOT for approval. The Department believes the IFR significantly changes the way recipients must implement their DBE plans. Therefore, we expect that recipients will amend their plans as soon as practicable after the Unified Certification Program (UCP) in their jurisdiction completes the reevaluation process described in § 26.111 to reflect the changes in the IFR. Any portion of a DBE program plan that is dependent upon presumptions of disadvantage, DBE goals, or any aspect of the prior DBE rule that has changed based on the IFR is no longer valid.

3. Do these changes apply to the Airport Concession Disadvantaged Business Enterprise (ACDBE) Program?

Yes, the IFR made changes to the ACDBE regulations in 49 CFR part 23 in a substantially similar manner to those changes made in 49 CFR part 26. Accordingly, these FAQs apply to ACDBEs.

- **October 3, 2025** – Interim Final Rule (IFR) issued by USDOT that made revisions and additions to 49 CFR Parts 23 and 26 ([federalregister.gov/documents/2025/10/03/2025-19460/disadvantaged-business-enterprise-program-and-disadvantaged-business-enterprise-in-airport](https://www.federalregister.gov/documents/2025/10/03/2025-19460/disadvantaged-business-enterprise-program-and-disadvantaged-business-enterprise-in-airport))
- **October 24, 2025** – USDOT issued FAQs for the IFR ([transportation.gov/sites/dot.gov/files/DBE_IFR_FAQs.pdf](https://www.transportation.gov/sites/dot.gov/files/DBE_IFR_FAQs.pdf))
- **December 1, 2025** – USDOT added additional FAQs to those previously issued on October 24
- **December 17, 2025** – USDOT will host a “Spotlight” webinar for small business opportunities (IFR does not appear to be on the current agenda)



New USDOT Frequently Asked Questions (FAQ)

- Issued October 24 and December 1, 2025
- Included 46 FAQs in following sections
 - A. General (7 FAQs)
 - B. Contracting Questions (14 FAQs)
 - C. Certification Reevaluation (15 FAQs)
 - D. Goal Setting and Counting (4 FAQs)
 - E. New Certification Application (3 FAQs)
 - F. Transit Vehicle Manufacturers (3 FAQs)

• **Relevant FAQs are indicated in the presentation.**

FAQ #

Official Frequently Asked Questions (FAQs) on the U.S. Department of Transportation's Disadvantaged Business Enterprise (DBE) Program and Disadvantaged Business Enterprise in Airport Concessions (ACDBE) Program Implementation Modifications, Interim Final Rule
(Effective Date October 3, 2025)

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transportation.gov/sites/dot.gov/files/DBE_IFR_FAQs.pdf

“The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.”

Rebuttable Presumption of Social Disadvantage

PRIOR to the USDOT DBE/ACDBE Program IFR (October 3, 2025)

- Majority owner(s) of applicant firms that were women or members of certain groups were ***rebuttably presumed to be socially disadvantaged***.

or

- Majority owner(s) who were not members of these groups could demonstrate social disadvantage by providing a personal narrative demonstrating experienced circumstances of social disadvantage.

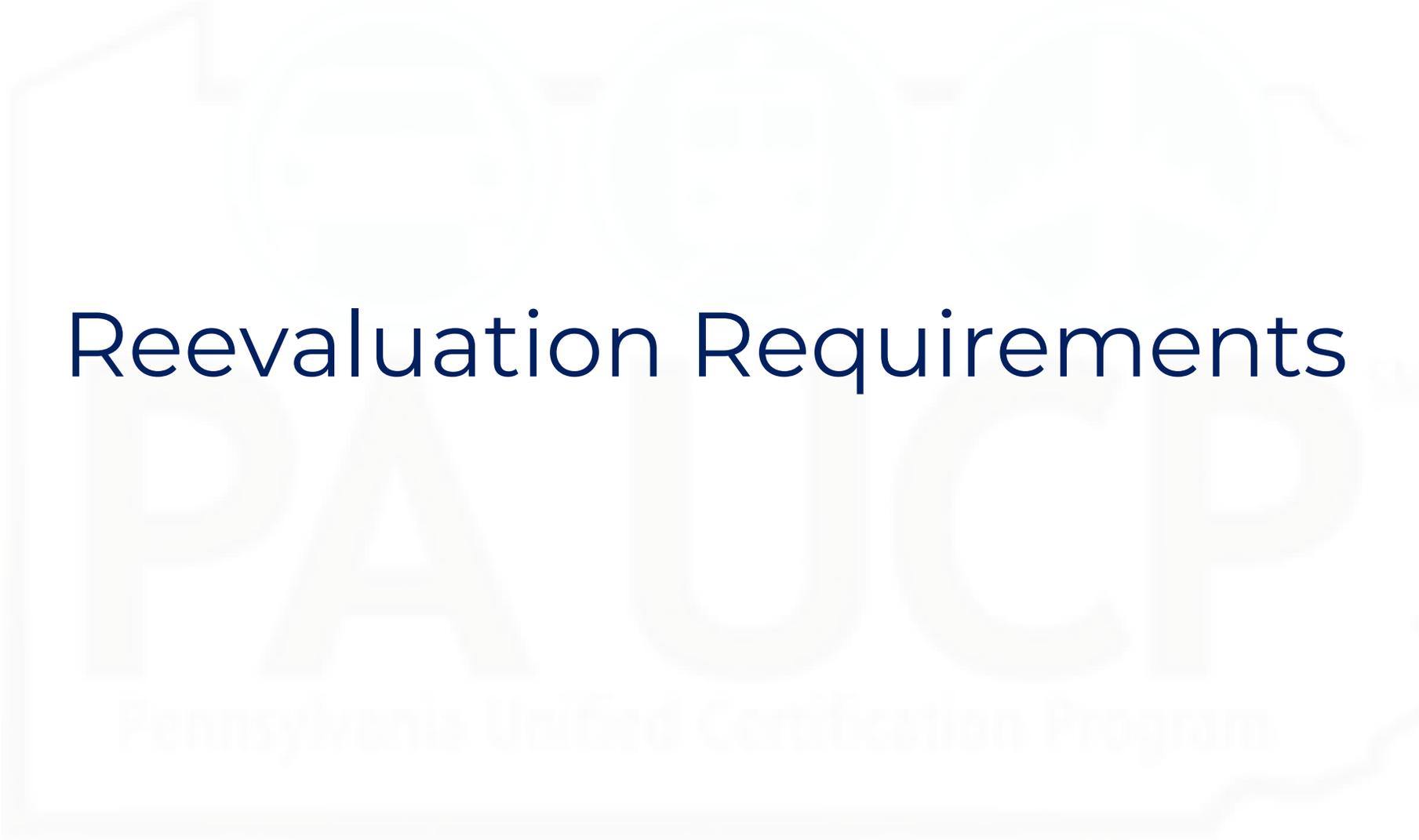


Rebuttable Presumption of Social Disadvantage

NOW

- The ***rebuttable presumption of social disadvantage*** has been **removed**.
- Eligibility of all currently-certified DBE/ACDBE firms must be re-evaluated (26.111).
 - Majority owner(s) of all currently-certified and new applicant firms must demonstrate their **social disadvantage through submission of a Personal Narrative (PN)**.
 - Determinations of disadvantage **cannot be based in whole, or in part**, on race or sex.
 - Based on the **individual owner(s) experiences** and circumstances within American society.
 - ✓ Being born in a particular country does not, standing alone, mean that a person is necessarily socially and economically disadvantaged.
 - Current **Personal Net Worth (PNW) statements must also be submitted**.





Reevaluation Requirements

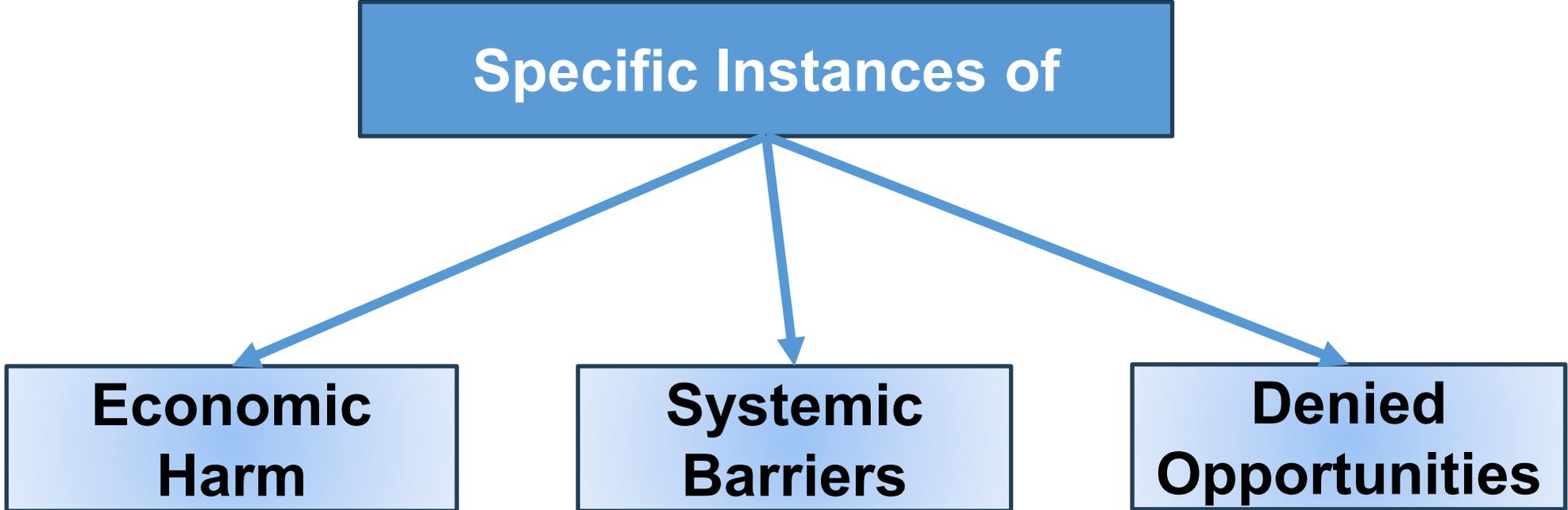
What Do Personal Narratives (PN) Have to Include?

- Per revised 49 CFR 26.67, PN must establish
 - Existence of disadvantage based on individualized proof regarding **specific** instances of:
 - ✓ Economic Hardship
 - ✓ Systemic Barriers
 - ✓ Denied Opportunities
 - That impeded the owner's progress or success in:
 - ✓ Education,
 - ✓ Employment, or
 - ✓ Business
 - Including obtaining financing on terms available to similarly situated, non-disadvantaged persons.
- The PN must state how and to what extent the impediments caused the owner economic harm
 - Including a full description of type and magnitude of harm



Personal Narrative Flow and Connections

Specific Instances



FAQ # C10 →

The SEDO does not have to all categories of Economic Harm, Systemic Barriers or Denied Opportunities.

FAQ # C11 →

The PN can discuss incidents and experiences of economic hardship, systemic barriers, and denied opportunities from any point in the owner's life. However, the incidents or experiences discussed in the narrative must not rely, in whole or in part, on race or sex.



Personal Narrative Flow and Connections

Impediments



Personal Narrative Flow and Connections

Impediments – A Closer Look

Education

Factors such as denial of equal access to institutions of higher education; exclusion from social and professional association with students or teachers; denial of education honors rightfully earned; and social patterns or pressures which discouraged the individual from pursuing a professional or business education.

Employment

Factors such as unequal treatment in hiring, promotions, and other aspects of professional advancement, pay and fringe benefits, terms and conditions of employment, or retaliatory behavior by an employer; and social patterns or pressures which have channeled the individual into nonprofessional or non-business fields.

Business

Factors such as unequal access to credit or capital; acquisition of credit or capital under commercially unfavorable circumstances; unequal treatment in opportunities for government contracts or other work; unequal treatment by potential customers and business associates; and exclusion from business or professional organizations.

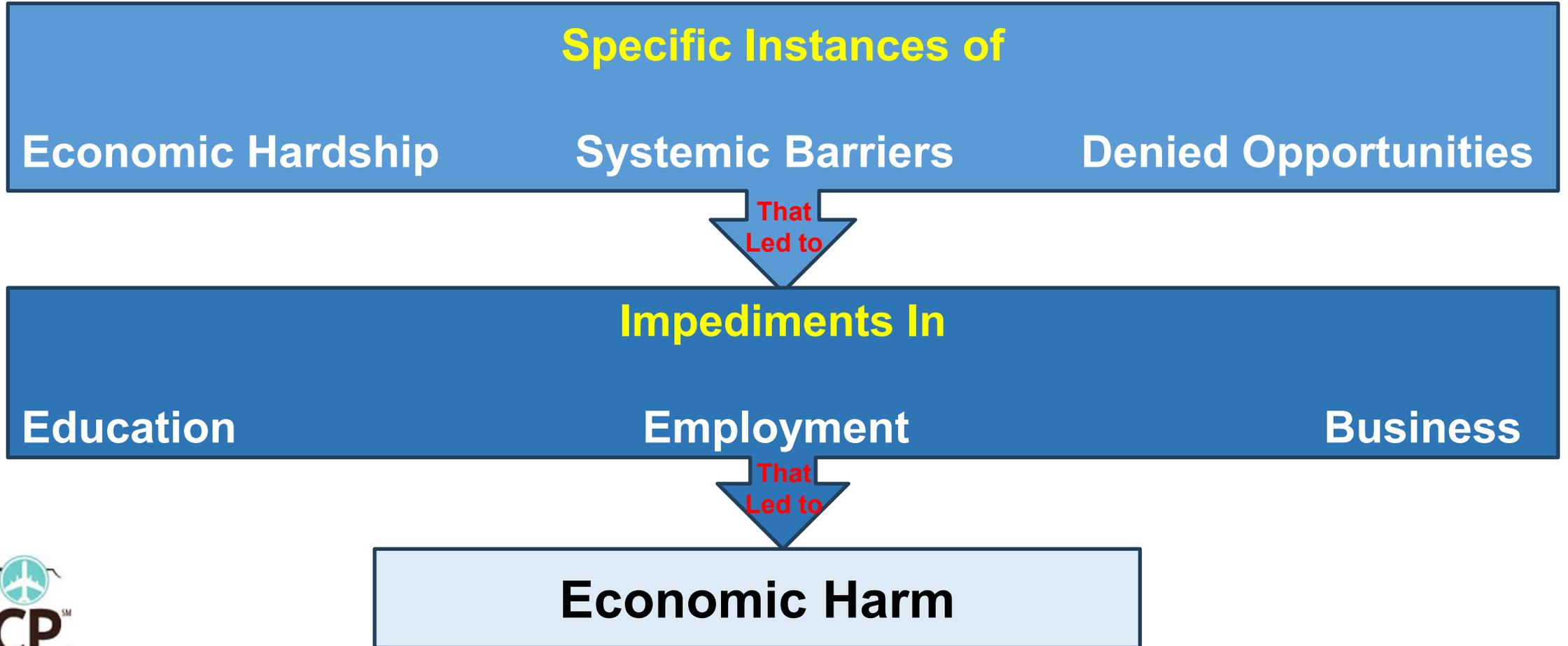
Personal Narrative Flow and Connections

Economic Harm

**How Did Impediments Cause
Economic Harm:**

**Describe Type and
Magnitude of
Economic Harm**

Personal Narrative Flow and Connections



Personal Narratives

- Details may be able to support PNs, but IFR does not note any required attachments or facts such as:
 - Dates
 - People
 - Instances
 - Economic/financial information
- Consider how someone in a non-rebuttably presumed group would present similar information.
- The PN should focus on **personal disadvantage vs. group-based discrimination.**
 - What instances were experienced by the owner(s) that resulted in disadvantage?



What is the Burden of Proof?

- Personal Narratives (PN) must establish the existence of disadvantage by a “preponderance of the evidence”.
 - *Preponderance of the evidence* means **more likely than not** (49 CFR 26.61).
 - Certifiers must consider all the information **viewed as a whole**.
- Remember, determinations of disadvantage cannot be based in whole, or in part, on race or sex.
- The IFR estimated that, on average:
 - Firms would take 20 hours to comply with the certification reevaluation.
 - Certifiers would spend 2 evaluation hours per reevaluation.



Personal Net Worth (PNW) Statements

- Reevaluation requires a current PNW Statement.
 - The current form was revised as part of the 2024 Regulation update.
 - [transportation.gov/sites/dot.gov/files/2024-09/Personal Net Worth Statement 4.9.2024 %28revised%29.pdf](https://www.transportation.gov/sites/dot.gov/files/2024-09/Personal%20Net%20Worth%20Statement%204.9.2024%20revised.pdf)
- Many current DBEs/ACDBEs have not completed a PNW using the new April 2024 form.
 - Do not underestimate the time needed to complete these.
 - **Please review the information that the PA UCP sent related to common PNW errors**

OMB APPROVAL NO: 2105-0586
EXPIRATION DATE: (05/31/2027)

U.S. Department of Transportation

Personal Net Worth Statement

As of _____

This form is used by all participants in the U.S. Department of Transportation's Disadvantaged Business Enterprise (DBE) and Airport Concession DBE (ACDBE) Programs. Each individual owner of a firm applying to participate as a DBE or ACDBE, whose ownership and control are relied upon for DBE certification must complete this form. Each person signing this form authorizes the certifying agency to make inquiries as necessary to verify the accuracy of the statements made. The agency you apply to will use the information provided to determine whether an owner is economically disadvantaged as defined in the DBE program regulations 49 C.F.R. Parts 23 and 26. Return form to appropriate certifying agency, not U.S. DOT.

Name			
Residence (As reported to the IRS) Address, City, State, and Zip Code			
Company's Legal Name		Phone:	
Marital Status: <input type="checkbox"/> Single <input type="checkbox"/> Married/Domestic Partnership		Business Phone:	
Assets	(Omit Cents)	Liabilities	(Omit Cents)
1. Cash and Cash Equivalents (checking and savings accounts, CDs etc.) (Complete Worksheet 1)		10. Mortgages on Real Estate Other Than Primary Residence (Complete Worksheet 10)	
2. Investment Accounts and Individual Securities (Complete Worksheet 2)		11. Loans on Life Insurance (Complete Worksheet 11)	
3. Value of Your Ownership Interest in Real Estate, Excluding Primary Residence (Complete Worksheet 3)		12. Other Liabilities (Complete Worksheet 12)	
4. Personal Property and Other Assets (Complete Worksheet 4)			
5. Ownership in Other Businesses (Complete Worksheet 5)			
6. Life Insurance (Cash Surrender Value) (Complete Worksheet 6)			
7. Amounts Owed to You (Complete Worksheet 7)			
8. Assets Held in Trust (Complete Worksheet 8)			
9. Assets Transferred to Related Parties Within the Past Two Years (Complete Worksheet 9)			
Total Assets:	0	Total Liabilities:	0

Personal Net Worth: 0



What Are UCPs Doing Now?

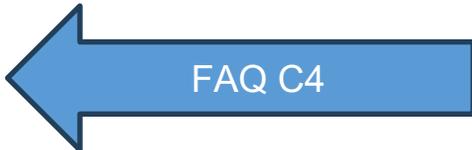
- Each DBE/ACDBE has a state that is its 'Jurisdiction of Original Certification' (aka 'home state')
 - **UCPs should conduct reevaluation only for firms for which they are the Jurisdiction of Original Certification (JOC).**
- Making reevaluations 'as quickly as practicable' and promptly notifying USDOT when it is completed.
 - Issuing a written decision to each current DBE/ACDBE stating whether they are recertified or decertified.
 - **Decertified firms can appeal to USDOT under 26.89.**
 - **UCPs cannot just decertify all firms without conducting a reevaluation.**
- USDOT can review a UCP's evaluation process.



FAQ C.1



FAQ C.7



FAQ C4



After Reevaluation

- Interstate Certifications
 - **When DBEs/ACDBEs are recertified by the UCP in their jurisdiction of original certification, they will be required to reapply for interstate certification with other states where they wish to be certified.**
- Anniversary Date
 - **All reevaluated DBEs/ACDBEs who become recertified will continue to have the same anniversary date they did prior to the reevaluation process (i.e., their original certification date**



PA UCP Timeline

PA UCPSM

Pennsylvania Unified Certification Program

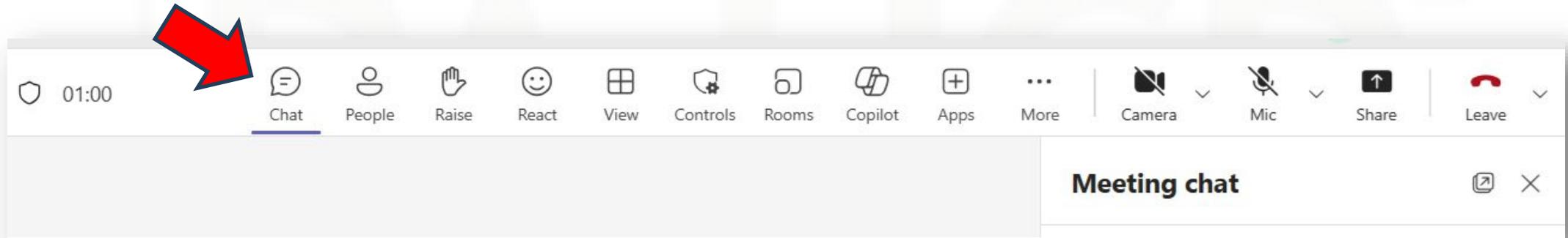
PA UCP Anticipated Timeline

- December 2, 2025
 - PA UCP sent out informational email, along with helpful information for crafting personal narratives
- January 5, 2026
 - PA UCP anticipates sent out instructions for completing and submitting Personal Narratives and Personal Net Worth Statements
- February 5, 2026
 - Anticipated date for DBEs/ACDBEs to submit Personal Narratives and Personal Net Worth Statements



Question and Answer Session

Please use the 'Chat' to type and submit your questions.



Thank You!

Presented By
M. Denise Bailey & Diane White
www.bwsols.com

