

USDOT Final Rule Update

Under the U.S. Department of Transportation (USDOT) Interim Final Rule (IFR), all firms currently certified through a Unified Certification Program (UCP) as Disadvantaged Business Enterprises (DBEs) must complete the required reevaluation process. The USDOT Issued a Final Rule (FR) on September, 25, 2026 instructing all Unified Certification Providers (UCP) to complete firm reevaluations no later than **December 24, 2026**. [Final Rule](#)

Under the Final Rule, each **UCP must complete its reevaluation process by December 24, 2026**. A UCP may request a one-time extension of up to 90 days from the Office of Small and Disadvantaged Business Utilization (OSDBU), provided the request is submitted before the reevaluation deadline and OSDBU determines that good cause exists. After completing the reevaluation process, the UCP must report its results to OSDBU, including any firms that failed to submit the required reevaluation documentation.

For firms certified through the Georgia Unified Certification Program (GUCP), failure to respond to a reevaluation request or failure to submit all required documentation by the applicable deadline will be issued a written notice and of nonresponse. This will result in automatic removal from the DBE Program without further administrative proceedings, as required under the FR.

Recommendation

To avoid certification risks, GUCP-certified DBE firms should begin preparing reevaluation materials well in advance of December 24, 2026. Firms should verify that ownership, control, financial, and supporting business records are current and complete, maintain copies of all submissions, and promptly respond to any requests for additional information from the certifying agency. Waiting until the final months of the reevaluation period may increase the risk of missed deadlines, incomplete submissions, and potential loss of DBE certification.

Key Deadlines at a Glance

Requirement	Deadline
Complete DBE Reevaluation Requirements	December 24, 2026
Failure to Submit Required Documentation by Applicable Deadline	Automatic Removal from DBE Program

Best Practice: Firms should target completing and submitting all reevaluation documentation at least **90 to 120 days before the deadline** to allow sufficient time to address agency questions, correct deficiencies, and avoid interruptions to DBE certification status.

To remain certified, you must submit the following:

1. Personal Narrative (PN)
2. Personal Net Worth (PNW) Statement
3. Any additional documentation supporting your individualized disadvantage

Your PN should describe:

- Specific instances of economic hardship, social barriers, or denied opportunities
 - How these experiences impeded your business or professional advancement
 - Why these experiences differ from those faced by non-disadvantaged individuals with comparable qualifications.
- The PN should not include race or gender as qualifiers.

If you have questions, please email marta@gob2g.com for assistance.