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

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 comprised 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.

This new rule does not affect a firm's MBE certification, which applies to state-funded contracts. However, the IFR 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 demonstrate social and economic disadvantage as individuals, by relating specific instances of economic barriers, systemic barriers, and denied opportunities that impeded the owner's progress or success in education, employment, or business.

- Mandatory Reevaluation of Certified DBEs/ACDBEs: All currently certified DBEs and ACDBEs must undergo a mandatory reevaluation under the new standards set forth in the IFR. Firms will need to submit new documentation, including a personal narrative and a current personal net worth statement, to their original certifying jurisdiction. UCPs must then determine each firm's eligibility, and issue written recertification and decertification decisions.
- 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.

According to the IFR, personal narratives submitted by DBE/ACDBE firms must establish "the existence of disadvantage by a preponderance of the evidence based on individualized proof regarding specific instances of economic hardship, systemic barriers, and denied opportunities that impeded the owner's progress or success in education, employment, or business."

In order to help firms participate in the certification reevaluation process, OMBE is providing this guidance to assist in relating personal and professional experiences that can be included in their individualized personal narratives.

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 certification reevaluation process***. In general, your personal narrative should:

- Be based on your individual experiences within American society
- 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 USDOT requirements, OMBE does not and will not use race- or gender-based presumptions of social and economic disadvantage. That is, identifying your race, sex, or association with a certain demographic group is not enough to show social and economic disadvantage. 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, systemic barriers, and denied opportunities (including dates, context, and outcomes)
- Show how and to what extent these experiences caused economic harm or limited your ability to succeed in your career, education, or business
- Compare your experiences to those of other similarly situated individuals who did not face the same disadvantage(s)

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. Description of Social Disadvantage – Describe the specific economic hardship, systemic barriers, and denied opportunities that you faced.

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. **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.

C. 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 others with similar 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 other similarly situated individuals 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 comparable terms to others in your industry.
    - 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.

D. 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.
- Estimate the magnitude of the impact, if possible, and note whether the effects are ongoing or have since been mitigated.

E. 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

Maryland
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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 similarly situated competitors?	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?