

**South Carolina Unified Certification Program**  
**Disadvantaged Business Enterprise Reevaluation Process**  
**Question and Answers**  
**January 2026**

**1. Which firms listed in South Carolina’s DBE/ACDBE Directory need to be re-evaluated in accordance with USDOT’s October 3, 2025 Interim Final Rule?**

All firms must be re-evaluated affirmatively to be eligible for the DBE Program. However, SCDOT will only reevaluate the certifications of firms for which SCUCP was the jurisdiction of the original certification (home state). If you have been certified with South Carolina through interstate certification, and we are not your home state, you must get recertified in your home state. If your original jurisdiction recertifies you, you must reapply for interstate certification with SCUCP if you wish to be certified in South Carolina.

**2. How do I get recertified?**

You must submit a Personal Narrative (PN) demonstrating DBE eligibility under the standards set forth in USDOT’s Final Rule. In addition, a current Personal Net Worth (PNW) statement is to be attached to the PN along with any other financial information you feel relevant.

SCUCP will review the information submitted to determine if you have or have not met the DBE eligibility standards. A written decision will be issued to you indicating that you have been recertified or is decertified.

**3. What should my PN include?**

It is important that your narrative describes specific situations you have experienced that establish the existence of disadvantage by a preponderance of the evidence; that it is more likely than not that you are socially and economically disadvantaged. Include incidents and experiences of economic hardship, systemic barriers, and denied opportunities within American society that held you back from succeeding in education, employment or business. Explain how these situations have caused you economic or financial harm and how they have held you back from success particularly as compared to other similarly situated non-disadvantaged individuals. Only your description of your individual experiences can be relied upon. The determination of social and economic disadvantage cannot be based even in part on your race or sex.

4. **Who, from my firm, should submit a PN?**

To be recertified and eligible for the DBE Program, your firm must verify that at least 51% is owned by socially and economically disadvantaged individuals. If your firm has multiple owners, personal narratives and personal net worth statements must be submitted individually by the owner(s) that make up at least 51% ownership.

For example, if your firm is a corporation owned by 3 people who each own 33.3%, then at least 2 of the owners must submit a personal narrative and personal net worth statement showing that both are socially and economically disadvantaged.

5. **How long must the personal narrative be and is there a specific form?**

There are no specific formatting rules for the personal narrative. SCUCP has developed a PN form to assist firms in submitting the required documentation. SCUCP requests that your PN be typed if possible. However, handwritten PNs will be accepted as long as they are legible.

The USDOT Personal Net Worth Statement form is included with the SCUCP PN form for your use in submitting this documentation. The form is also located at

<http://www.transportation.gov/civil-rights/disadvantaged-business-enterprise/new-dbe-personal-net-worth-statement>

There are no minimum or maximum length requirements for the PN. You must include sufficient detail to demonstrate that it is more likely than not your firm is socially and economically disadvantaged.

6. **Do I have to establish social disadvantage in all three areas (education, employment, and business) outlined in SCUCP's PN form?**

No. Your personal narrative needs to establish the existence of disadvantage by a preponderance of the evidence associated with one or more of these areas. In addition, other relevant evidence beyond these three areas may be considered but the incidents or experiences discussed must not rely, in whole or in part, on race or sex.

7. **Is there a date that my Personal Narrative and PNW must be submitted by? What happens if I just don't submit them?**

The new USDOT rule did not establish a deadline for firms to submit PNs and PNW statements. However, to establish completion of the reevaluation process and notification of such to USDOT, a UCP can establish a date for which firms should submit required documentation. As a result, **SCUCP is now accepting documents for reevaluation and is encouraging firms to submit PNs and PNW statements before or by June 1, 2026.**

Firms may still submit the required documentation for reevaluation later but will remain ineligible for the DBE Program until they submit the required information affirmatively demonstrating social and economic disadvantage. It is unknown at this time if USDOT will provide further direction to UCPs in finalizing the reevaluation process of current DBEs and how that direction could impact firms that do not submit documentation by SCUCP's June 1, 2026 date. Should further direction be provided by USDOT, SCUCP will update this Q&A promptly.

**8. Once I am recertified, will my anniversary date change?**

No. A firm's anniversary date will remain based on its original certification for annual update requirements.

If your firm is recertified, SCUCP's written notice will include directions on when your annual update requirements are to be submitted. If your anniversary date occurred between October 3, 2025 and the date of SCUCP's written notice or is approaching soon after SCUCP's written notice, a grace period will be provided. Failure to provide all documentation in accordance with 49 CFR 26.83 within the grace period would be grounds for SCUCP to take appropriate action (i.e., suspension or decertify).

**9. Once I submit the required documentation, when will I know if my firm has been recertified?**

SCUCP will review submissions in the order they are received. Due to the anticipated volume of submissions, it will likely take up to 45 days to complete the reevaluation. This timeframe is contingent upon receipt of completed and signed PNs and PNW statements and all supporting documentation. Incomplete submissions will delay the start of the reevaluation process.

Once the reevaluation is complete, your firm will receive a written notice of determination, advising you whether you are recertified or decertified.

**10. What happens if my firm is not found to be socially and economically disadvantaged based on the statements submitted?**

If the reevaluation results in a determination that your firm is not socially and economically disadvantaged, your firm will be decertified. Your firm will not be included in the SCUCP directory when it is reinstated, and participation by your firm on USDOT-assisted contracts will not be eligible to be counted for DBE goal credit.

SCUCP's written notice will provide information on the appeal process options available if you are decertified.

**11. What if my firm does not plan to re-certify?**

If you do not plan on submitting the required documentation for a recertification determination, please send a written withdrawal to SCUCP by June 1, 2026. This notification will assist SCUCP in efficiently completing the reevaluation process.

**12. If South Carolina is not my home state and my firm is recertified by my original Jurisdiction of Certification (JOC), when can I reapply for interstate certification with SCUCP?**

You can apply anytime after you are recertified by your JOC. To obtain interstate certification by SCUCP, you must provide all the documentation required in 49 CFR 26.85.

**13. What if South Carolina is my home state and I wish to apply for certification?**

SCUCP is suspending accepting new applications. Firms will be notified on our website when new applications will be accepted.

New applicants will be required to submit a personal narrative in addition to meeting the certification standards at 49 CFR part 26, Subpart D. USDOT has stated that the Uniform Application Form and the Declaration of Eligibility Form will be updated to account for the regulatory changes made in the IFR. New applicants must use these forms when they become available.