

UPDATE: November 14, 2025

All businesses holding a Disadvantaged Business Enterprise (DBE) certification from the Montana Department of Transportation (MDT) must complete a recertification process in compliance with 90 Fed. Reg. 47969 (October 3, 2025). The following also applies to Airport Concession Disadvantaged Business (ACDBE) certifications.

To be recertified as a DBE you must:

1. Complete a Personal Narrative using the MDT [approved form](#).
2. Submit an updated Personal Net Worth using the [approved form](#).
3. Upload both documents to a secure file transfer service located here:
<https://transfer.mt.gov/Home/Login>

This must be completed no later than December 31, 2025. Businesses that do not submit the necessary information will remain ineligible for the DBE program until they submit the required documentation demonstrating eligibility.

If you have any questions, please email mdtdbeprogram@mt.gov.

The MDT DBE Team will review your documents to ensure they meet the qualifications. You will be notified via email when the review is completed.

Please note:

- DBE goals will not be reinstated on projects until all firms complete this process.
- Until that time, DBE Reimbursements for Supportive Services are suspended.
- Firms that do not respond to recertification communications will be decertified without the opportunity to have a hearing. However, they can reapply for certification.
- All firms previously certified as a DBE were also certified as a Small Business Enterprise (SBE). The SBE certification has not been affected, and you will remain SBE certified even if you are no longer DBE certified.
- If information is made available to MDT from U.S. Department of Transportation that could change any of this process, we will notify DBEs.

If you no longer wish to be DBE certified, please email us at mdtdbeprogram@mt.gov.

Any business that is decertified under the recertification procedures required under 49 CFR §26.111 is entitled to appeal the decertification to the U.S. Department of Transportation

under the procedures described in 49 CFR §26.89. Please note, if you appeal to the U.S. Department of Transportation, you will not be able to add facts to your Personal Narrative on appeal.

Interstate/Reciprocal DBE Certifications: Based on guidance from USDOT, Montana is not required to reevaluate DBEs that obtained certification in Montana through interstate certification procedures. These DBEs must be reevaluated by the jurisdiction of original certification. If your business is recertified by the jurisdiction of original certification, you must reapply for interstate certification within Montana.

Q&A Sessions are scheduled for:

Friday November 21, 2025, noon-1:00pm

Monday November 24, 2025, 8:00am-9:00am

Wednesday December 3, 2025, noon-1:00pm

Please email Michele at mmorgenroth@mt.gov to register for a Q&A Session. Please identify which date you wish to register for.

October 16, 2025

On October 03, 2025, the U.S. Department of Transportation (USDOT) issued an interim final rule (IFR) requiring immediate changes to the Disadvantaged Business Enterprise (DBE) program regulations.

Key Provisions

- **Certification Review:** All DBE firms previously certified using race- or sex-based presumptions of social and economic disadvantage must be recertified by MDT to determine eligibility under the new standards established in the IFR.
- **Personal Narrative Requirement:** Certified DBE firms owned by an individual who was presumed to be disadvantaged (e.g., women, Black American, Hispanic American, Native American, Asian Pacific American, Subcontinent Asian American), must now submit a personal narrative explaining their social and economic disadvantage, without regard to race or gender, and submit an updated personal net worth statement.
- **Suspension of DBE Goals for Future Projects:** For contracts advertised on or after October 03, 2025, MDT and other DOT fund recipients cannot set DBE goals until the certification review process described in the bullet above is complete.
 - We will discontinue Commercially Useful Function (CUF) monitoring of existing projects with DBEs unless we receive information otherwise.

- The bidder's list is still required, except for the race and gender reporting.

DBE Impact

- The certifications for any DBE firm that previously qualified based on a presumed disadvantage are not effective during the certification review period.
- Affected firms will be notified directly. The notice will include detailed instructions regarding the recertification process and submission requirements for firms seeking to regain DBE certification.
- DBE firms must submit a personal narrative and a personal net worth statement, which will be reviewed during the certification review period. If a firm fails to comply or does not meet the standard of certification, it will be decertified **without** the opportunity to go to a hearing.
- Please do not submit any personal narratives or personal net worth statement until you are contacted directly by MDT.
- This change **does not** impact prevailing wage, certified payroll, or prompt payment.
- DBE Reimbursements are suspended until all firms are recertified.

Small Business Enterprise (SBE) Program Continuity

The SBE program remains race- and gender-neutral, focusing solely on economic disadvantage, and is not impacted by the interim rule. While DBE goals are paused, MDT remains committed to advancing SBE program goals. The SBE program is designed to expand the pool of qualified contractors, enhance availability of resources, and foster greater competition, ultimately driving more competitive pricing and delivering greater value to Montana and the traveling public. All DBEs formerly certified by MDT are also certified as SBEs. Please check the MDT website for updates as to when SBE goals will be reinstated on projects.

Support & Resources

MDT is committed to assisting certified firms and applicants through this transition through the following efforts:

1. Virtual Q&A sessions will be scheduled once we know more. Please check back to this website for more information.
2. 1:1 Support: Contact a [Business Development Specialist](#)
3. Email: mdtsbeprogram@mt.gov

Questions

Review the full Disadvantaged Business Enterprise Program and Disadvantaged Business Enterprise in Airport Concessions Program Implementation Modifications [online](#).