



City of Dayton

HRC

Human Relations Council

Notice Regarding Federal Disadvantaged Business Enterprise (DBE) Program Changes

The Human Relations Council (HRC) is aware of recent changes to the federal **Disadvantaged Business Enterprise (DBE) program**. While the HRC does not place DBE goals on City of Dayton projects, many small businesses that are DBE-certified also choose to **cross-certify in the City's Procurement Enhancement Plan (PEP) as Minority Business Enterprises (MBE) or Woman-Owned Business Enterprises (WBE)**.

We strongly encourage vendors to review the **DBE Interim Final Rule (IFR)** and obtain information directly from the source. The full IFR is available [here](#).

Key Points Affecting the DBE Program

As adopted by the **Ohio Department of Transportation (ODOT)**, the following changes take effect **October 3, 2025**:

1. Certification Qualification Changes

- Ends the *presumption of disadvantage* based on race or gender.
- Suspends goal-setting for future projects for at least one year.

2. Suspended Reporting Requirements

- Ends compliance enforcement on previously established DBE project goals.
- Reporting to the FAA and other agencies on DBE goal attainment is paused during this period.

3. Personal Narrative Requirement



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- DBE-certified firms whose ownership previously qualified under race- or gender-based presumptions must **reapply** using a **race- and gender-neutral personal narrative**.
- The narrative must describe the applicant's *individual* social and economic disadvantage without referencing race, gender, historical context, or regional disparity studies.
- Applicants must also submit an **updated personal net worth statement** as part of the recertification process.

4. Suspended Goal Setting

- A one-year moratorium on new DBE goal setting should be expected.

Please note that **these changes do not affect** prevailing wage requirements, certified payroll, or prompt payment provisions.

ODOT will issue additional guidance on the recertification process and provide an **online tutorial** beginning **October 15, 2025**, to assist vendors in meeting the new requirements.