

Caltrans DBE Individual Disadvantage Documentation Worksheet

California Unified Certification Program (CUCP)

49 CFR Part 26 – Interim Final Rule

This worksheet is suggested to organize the facts supporting an owner's individualized social and economic disadvantage. It is designed to help DBE applicants prepare Personal Narratives that can be reviewed objectively by Caltrans and other CUCP certifying agencies under federal law.

This worksheet is not submitted to Caltrans; it is used to develop the Personal Narrative that is submitted.

Purpose

Under the Interim Final Rule, DBE eligibility must be supported by specific, factual examples showing that an individual owner:

1. Encountered a real social or economic barrier,
2. Was harmed by that barrier, and
3. Experienced measurable limits on education, employment, or business opportunity.

This worksheet structures that information in a format that aligns with California Unified Certification Program (CUCP) review rubrics and federal standards.

How CUCP Uses This Information

Certifiers within the CUCP, including those at Caltrans, evaluate Personal Narratives to determine whether the evidence shows, by a preponderance of the evidence, that the owner is socially and economically disadvantaged.

This requires proof of causation, not just hardship or identity.

Disadvantage-Triggering Event

Describe the specific event or circumstance that created the disadvantage (s).

Field	What to Enter
Date(s)	When did it happen?
Location	Where did it occur?
Parties	Who made the decision or controlled the outcome?
Situation	What exactly occurred?

Purpose: Identifies the fact pattern that triggered disadvantage.

Limiting Condition

Describe how that event limited access to opportunity.

Examples of qualifying limitations:

- Denial or delay of credit
- Exclusion from contracts or networks
- Restricted access to education or training
- Employment barriers

What was restricted?	How was access limited or delayed?

Purpose: Shows that the event created a real barrier, not just an inconvenience.

Measurable Harm

Describe the economic or professional harm caused.

Category	What was lost, delayed, or made more costly?
Income	
Business growth	
Contracts	
Credit or capital	
Time	

Attach or reference documents that verify the harm:

- Loan denials
- Tax returns
- Financial statements
- Emails or correspondence
- Contract awards or rejections

Purpose: Proves that the barrier produced actual disadvantage, not speculation.

Owner Response

Describe what the owner did to try to overcome the barrier.

Action taken	Cost, delay, or burden incurred
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This does not excuse the harm. It helps establish:

- How persistent the barrier was
- How much extra effort was required to compete

Counterfactual Comparison

Explain how a similarly situated non-disadvantaged person would likely have fared.

What typically happens	What happened to you
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Purpose: Shows that the disadvantage was relative and structural, not personal failure.

CUCP Review Test

Your example should answer all three of these:

1. Did a real barrier exist?
2. Did it cause measurable economic harm?
3. Did it place the owner at a disadvantage compared to similarly situated peers?

If any answer is “no,” the example is not legally sufficient for DBE certification.

How Many Examples Are Needed?

To establish social disadvantage through the personal narrative, a DBE owner does not have to meet all categories of economic hardship, systemic barriers, and denied opportunities described in 49 CFR § 26.67.

Applicants should prepare three to five examples and select one to three of the strongest to include in the Personal Narrative, consistent with the guidance in the original worksheet.