

How Can I Add Another NAICS Code To My DBE Certification?

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When you become certified as a DBE (disadvantaged business enterprise), you are only certified for a particular NAICS code or codes. NAICS stands for North American Industry Classification System, and it is used throughout North America to classify businesses with a six digit number based on the primary type of work the business performs. But what if your business picks up an additional line of work along the way? How can you update your DBE certification to include another NAICS code or change the NAICS code used for your certification?

If you wish to add or change your company's NAICS codes for purposes of DBE certification, you must fill out the appropriate form issued by your certifying agency. An example of the form used in Pennsylvania can be found [here](#).

You will have to attach verification and evidence that your company has and/or is providing the products or services indicated in the NAICS that you desire to use.

Pursuant to 49 C.F.R. § 26.71(n), in order to become certified in an additional type of work, the company needs to show that its socially and economically disadvantaged owners are able to control the firm with regard to that type of work.

For example, a company previously registered as a residential real estate firm requested to add a new NAICS codes, including Hotels (except Casino Hotels) and Motels. However, the only evidence the company provided of its work in that area was booking lodging for government agencies. The U.S. Department of Transportation found that procuring one contract with an particular NAICS code did not demonstrate that the company had "the requisite overall understanding of, and managerial and technical competence directly related to, the operation of a hotel or motel." The company's request to add the NAICS code was denied. In re: Brian Hall Properties, 18-0109, March 19, 2019.

Before your company seeks to add an additional NAICS code to its DBE certification, you must make sure that the company actually is performing work and has experience in the industry covered by the code.

If you have any questions about adding an NAICS number or questions about the DBE certification process, please feel free to reach out to me.