Driver qualification file checklist

49 CFR Part 391

One sheet per driver. Keep it as the first page of the file.

DRIVER NAME

START DATE

LICENSE ☐ Non-CDL ☐ CDL

DOCUMENT	IN FILE	DATE ON DOCUMENT	EXPIRES OR NEXT DUE
Before the first trip			
Application for employment, complete and signed §391.21	☐		
Copy of the driver's license, right class for the truck Good practice. Required when a CDL stands in for the road test (§391.33(b)).	☐		
Medical examiner's certificate (medical card) §391.43. Non-CDL drivers. CDL drivers: the driving record is the proof (page 2).	☐		
Note that the examiner was on the National Registry §391.23(m)(1). Non-CDL drivers only.	☐		
Road test form and certificate of road test §391.31. Or a CDL copy, or a certificate from the last 3 years (§391.33).	☐		
Within 30 days of the start date			
Driving record (MVR) from every state licensed in, last 3 years §391.23(a)(1). CDL drivers: the licensing state's record is due before the first trip (page 2).	☐		
Safety history from each DOT-regulated employer, last 3 years §391.23(c), (d). With the driver's authorization (§391.53), signed before you send the request. Or a record of your attempts. No such employer in 3 years: a dated note that says so. Keep this part locked.	☐		
Every 12 months			
New driving record (MVR) from every state licensed in that year §391.25(a)	☐		
Annual review note: who reviewed the record, and the date §391.25(c)	☐		
Renewals			
New medical certificate before the old one expires §391.45. 24 months at most, sometimes less. Non-CDL: add a new registry note. CDL: pull a new driving record.	☐		
Renewed driver's license	☐		
Medical variance or skill performance certificate, if any §391.49, §391.51(b)	☐		

FILE CHECKED BY

DATE

NEXT CHECK DUE

CDL drivers, and the rules behind the list

49 CFR Parts 382, 391

Use the table for any driver on a truck rated 26,001 lbs or more.

DOCUMENT	DONE	DATE	NEXT DUE
CDL drivers add			
Driving record from the CDL state, before the first trip §391.23(m)(2), §391.51(b)(6). Must show the medical status and type of driving. It is the medical proof: no paper card or registry note.	☐		
Application lists 10 years of commercial driving jobs, not 3 §391.21(b)(11)	☐		
Negative pre-employment drug test §382.301. Keep with drug and alcohol records, not in the open file.	☐		
Clearinghouse full query before the first trip §382.701. The driver's consent is required.	☐		
Clearinghouse query every 12 months §382.701	☐		

Who needs a file

- Every person who drives a truck of 10,001 lbs or more (truck plus trailer) for you on interstate moves. A 26 ft box truck counts, CDL or not.
- Part-time and seasonal drivers.
- Owners who drive.
- Independent contractors and their drivers, when they run under your DOT number.
- The local leg of a move that starts or ends in another state is interstate. Moves that start and end in your state follow state rules. Check yours.

How long to keep it

- The whole file: as long as the driver works for you, plus 3 years.
- Yearly driving records, review notes, medical certificates, and registry notes can come out 3 years after their date.
- Previous employer answers: locked, limited access, kept 3 years after the driver leaves.
- Clearinghouse query records: 3 years.

Five gaps to check for

Only three documents in the folder	License, medical card, driving record. No application, no road test, no previous employer check.
No road test for non-CDL drivers	A regular license does not replace the road test. Only a CDL, or a road test certificate from the last 3 years, does.
A driving record with no review note	Ordering the record is half of it. Someone has to read it and sign a dated note.
An expired medical card	The driver is not qualified the day after it expires. Track the date yourself.
Thin files for contractors' drivers	If they drive under your DOT number, the file is yours to keep, whatever the contract says.

No longer required: the yearly list of violations signed by the driver. That rule (§391.27) was removed in 2022. Old packets still carry the form.

How to keep the file current

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The file is easy to build once. Audits fail on the dates that pass after that.

1 One folder per driver

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Drivers/
  Last name, First name/
    1 Application/
    2 License and medical card/
    3 Driving records/
    4 Road test/
    5 Annual reviews/
    6 Previous employers (locked)/
  Former drivers/
    Last name, First name (left 2026-03)/
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Name every file the same way:

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Document - Last, First - YYYY-MM-DD
Medical card - Smith, John - 2026-04-18
MVR GA - Smith, John - 2026-05-02
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The date is the date on the document, not the day you scanned it. Year first, so the files sort in order. No phone photo names like IMG_4471.

2 Two people, two jobs

Whoever hires the driver

- Collects the application, license copy, and medical card.
- Runs the road test and signs the certificate.
- Does not put the driver on a truck until safety says the file is ready.

Whoever owns safety

- Orders the driving record and contacts previous employers.
- Checks the medical examiner on the National Registry.
- Enters every expiry date in the tracker the same day.
- Files the 30-day items before day 30, not after.

In a small company both jobs may be you. Keep them as two separate steps anyway.

3 The monthly check

First working day	Open the tracker (one row per driver, in Airtable). Sort by the next date due.
Due within 60 days	Tell the driver in writing. Book the medical exam or order the driving record now.
Due within 30 days	Second notice. Dispatch is told the date the driver comes off the schedule if nothing arrives.
Expired	The driver does not drive. No exceptions for a busy Saturday.
New document arrives	Scan it, name it, file it, and update the tracker the same day.

4 When a driver leaves

Move the folder to Former drivers and write the leaving date in the folder name. Set a reminder three years out. Do not delete anything before then.

CDL medical cards changed in 2025. The examiner now sends the result to FMCSA electronically and it shows on the driving record. The temporary exemption for paper cards ended on October 11, 2026 (Alaska licenses have until October 12, 2027). That record is now the proof. Non-CDL drivers still get a paper certificate, and you keep a copy.

Based on 49 CFR Part 391, checked November 2026. Not legal advice. Confirm current federal and state rules.