

Driver Qualification File Checklist

Use one checklist for each driver. It lists what a driver qualification (DQ) file contains under 49 CFR Part 391, the Clearinghouse records under 382.701, when each item is due and how long to keep it. Check the current rules at ecfr.gov.

Part 1 — What goes in each driver's file

Document	Rule	When	Keep	Notes
Employment application	391.21	Before the driver starts	While employed + 3 years	Signed and dated. Covers 3 years of addresses and employers. CDL applicants also list commercial driving employers for the 7 years before that.
Motor vehicle record from each state where the driver held a license or permit in the past 3 years	391.23(a)(1), (b)	Within 30 days of hire	While employed + 3 years	If a state does not respond, note your good-faith effort.
Road test certificate, or a copy of the accepted equivalent	391.31, 391.33	Before the driver operates a CMV	While employed + 3 years	Equivalents: a CDL for the vehicle type you assign (doubles/triples and tank endorsements excluded), or a road test certificate issued in the past 3 years.
Medical certification for CDL drivers	391.51(b)(6)(ii), 391.23(m)(2)	After every exam	3 years from when it was obtained	A motor vehicle record from the driver's licensing state (CDLIS) that shows the current medical certification. Since June 23, 2025, examiners send results to the state electronically.
Medical examiner's certificate for drivers without a CDL	391.43, 391.51(b)(6)(i)	At hire and after every exam	3 years from the exam	Certificates last at most 24 months, sometimes less. Add a note that you verified the examiner on the National Registry (391.23(m)(1)).
Medical variance documents, if any	391.49, Part 381	When issued	3 years	Skill Performance Evaluation certificate or exemption letter.
Annual motor vehicle record	391.25(a)	At least every 12 months	3 years from when it was obtained	From each state where the driver held a license or permit in the past 12 months.
Annual review note	391.25(b), (c)(2)	At least every 12 months	3 years	Record who reviewed the driving record and the date. Consider violations and accidents.
Clearinghouse full query (CDL drivers)	382.701(a)	Before the driver performs safety-sensitive functions	3 years	The driver consents electronically in the Clearinghouse.
Clearinghouse annual query (CDL drivers)	382.701(b)	At least once a year	3 years	A limited query needs the driver's written general consent. If it shows information, run a full query within 24 hours.

Kept in a separate, access-controlled file (391.53)

Document	Rule	When	Keep	Notes
Previous employers' safety performance history	391.23(c)–(e), 391.53	Within 30 days of hire	While employed + 3 years	Responses from DOT-regulated employers of the past 3 years, or a record of your good-faith attempts with each employer's name, address and contact date.
Driver's written authorization to request drug and alcohol history	391.23(f), 391.53(b)(1)	At hire	While employed + 3 years	Without it, the driver may not operate a CMV for you.

Part 2 — Yearly calendar for each driver

When	What to do	Rule
Before the driver starts	Application, road test or equivalent, medical certification, Clearinghouse full query, written notice of the driver's rights about previous-employer information	391.21, 391.31, 391.33, 391.41, 382.701(a), 391.23(i)
Within 30 days of hire	Motor vehicle records from each state for the past 3 years and previous-employer inquiries	391.23
After every medical exam	CDL drivers: a new CDLIS motor vehicle record. Drivers without a CDL: a copy of the new certificate and a National Registry note	391.51, 391.23(m)
Every 12 months	Motor vehicle record from each state, the review note, and a Clearinghouse query	391.25, 382.701(b)
Before expiry dates	CDL renewal, medical certification, Skill Performance Evaluation certificate	391.11, 391.45, 391.49
When the driver leaves	Keep the whole file for 3 more years	391.51(c)

Frequently cited problems

- Previous-employer inquiries missing or not documented
- Annual review not done within 12 months, or no reviewer named
- Expired medical certification
- Incomplete or unsigned application
- Clearinghouse queries not documented

Exceptions to check

- Multiple-employer drivers have reduced requirements (391.63).
- Drivers furnished by another motor carrier can be covered by that carrier's certificate (391.65).

DQ Keeper is an iPhone and iPad app that keeps these files and reminds you of these dates. It is coming to the App Store: dqkeeper.com.

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