

Welcome to Your DQ Audit Readiness Kit



Provided by J. J. Keller & Associates, Inc.

Hello and welcome! This kit is designed to help you confidently prepare for a Driver Qualification (DQ) file audit by the FMCSA — and protect your business from costly violations, fines, and litigation. Whether you're new to compliance or just need a reliable way to stay organized, this kit is your go-to resource for building and maintaining audit-ready driver files.

Inside, you'll find practical checklists, regulatory insights, and tools that simplify compliance and reduce your risk.

Let's get started!



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DQ Audit Readiness Kit

Provided by J. J. Keller & Associates (cont.)



Are Your Driver Files Audit-Ready?

Fines are rising. Audits are increasing. Is your fleet prepared?

Since 2020, the number of **onsite FMCSA audits has more than doubled**, jumping from under 2,000 to over 4,150 in 2025. These in-person audits are deeper, tougher, and more likely to uncover gaps in your Driver Qualification (DQ) files.

And the penalties? They're steep. **Up to \$1,584 per day per violation** — maxing out at **\$15,846** — for not keeping DQ records in compliance with FMCSA regulations.

Common DQ File Issues & How to Prevent Them



Missing/Incomplete Driver Application (391.21)

PREVENTION

- Use a DOT-compliant application form
- Train HR to verify completeness
- Add a secondary review step



Missing Safety Performance History (391.23)

PREVENTION

- Request SPH from past DOT employers (3 years) after conditional offer
- Log at least two contact attempts
- Keep SPH responses secure and restricted review step
- File signed driver rebuttal rights form



Invalid or Improper License on MVR

PREVENTION

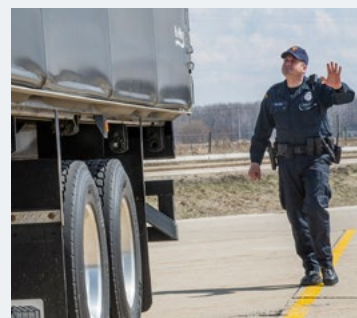
- Pull MVR from current state before hire
- Match license class/endorsements to vehicle
- Use MVR monitoring for ongoing compliance



The Risk is Real. The Time to Prepare is Now.

Your DQ files must stand up to scrutiny from FMCSA auditors.

This DQ Audit Readiness Kit from J. J. Keller® gives you the tools to get compliant, stay compliant, and protect your business from costly consequences.



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 **J. J. Keller**
& Associates, Inc.
Since 1953



Driver Qualification Compliance Quiz

How would you respond to these scenarios?

1. John is 20 years old and drives interstate but does not haul hazardous materials. Is he qualified to drive? Why or why not?
2. Sarah is 22 years old and has a valid CDL. She recently passed her DOT medical exam. Her carrier needs to include her MVR in the DQ file. How many days does the carrier have to do this?
3. Mike is applying for a driving position with a carrier. He has a medical certification issued 60 days ago by a medical examiner who is on the registry. Is the carrier required to verify the examiner's credentials?
4. A carrier is reviewing a prospective driver's DQ file. The driver's employment ended two years ago. How long must the carrier retain the DQ file?
5. Lisa has a non-CDL driver's license and is applying for a driving position. Can the carrier accept her license in lieu of administering a road test?



Quiz Answer Key

1. **Answer:** No, John must be at least 21 years old to drive interstate.
2. **Answer:** On and after June 23, 2025, the regulations do not allow a specific number of days to get the MVR in the DQ file. However, the current FMCSA waiver allows a carrier to use a Medical Examiner's Certificate (MEC) in a CDL driver's DQ file for up to 60 days after the DOT exam, by which time an updated MVR must replace the MEC.
3. **Answer:** Yes, the carrier must verify that the medical examiner who issued Mike's medical certification is on the registry if Mike is a non-CDL driver or holds a CDL from a state that does not yet receive direct updates from the National Registry.
4. **Answer:** The carrier must retain the DQ file for three years after the driver's employment ends.
5. **Answer:** No, the carrier cannot accept a non-CDL driver's license in lieu of administering a road test. The carrier can accept a copy of a valid CDL or a road test certificate issued by a carrier within three years prior to the driver's hire date.

THE DQ INVENTORY

Get Drivers Qualified. Keep Them Qualified.

The **DQ Inventory** was developed by J. J. Keller expert Mark Schedler as an authoritative reference to help you keep all regulated drivers qualified. *It goes beyond what you need to have in the DQ file.* Items with check marks apply to CDL CMV drivers only. All other items apply to drivers of any regulated CMV, CDL CMV drivers, or situationally.



INITIAL DRIVER QUALIFICATION		CDL CMV Drivers Only ¹	Check the box if applicable to your operation	Regulatory Citation	Retention Period
DRIVER APPLICATION	* Driver application for employment with all required elements completed and signed by the driver			391.21	Employment plus 3 years
	* Additional 7 years of regulated employers for CDL-vehicle drivers not required to be investigated under 391.23	✓		391.21(b)(11)	
ROAD TEST	* Road test form and certificate conducted by your motor carrier with the driver to receive a copy of the certificate also, <u>or</u>			391.31(g)	
	* Exception: Road test certificate conducted by another motor carrier within the past 3 years; <u>or</u>			391.33(a)(2)	
	* Exception: Copy of a CDL accepted in lieu of road test — not applicable if hired to operate doubles, triples, or tankers, or drivers using the alternative vision standard for the first time. No copies of license renewals required.	✓		391.33(a)(1) and 391.44(d)	
DRIVER INVESTIGATION	** Original motor vehicle record (MVR) from each licensing authority that issued the driver a license including the MVR that is also used as proof of medical certification at hire.			391.23(a)(1) and (b)	Employment plus 3 years
	General employment verifications before October 30, 2004, to all employers for the 3 years prior to the application date or a record of good-faith effort			391.23(a)	
	** Safety performance history request (SPHR) of employment dates and DOT accidents for hires on or after October 30, 2004, is required from all DOT-regulated employers for the 3 years prior to the application date or a record of good-faith effort. Store secured with limited access and any driver rebuttals to the Safety Performance History data and rebuttal responses from the former DOT-regulated employers. (Effective January 6, 2023, drug and alcohol violations from FMCSA-regulated employers must be verified with the full Clearinghouse query.)			391.23(d), 391.23(j)(2) and (j)(3), and 391.53	
	** Written consent to request for drug and alcohol violation information from prior employers and records of the returned violation information (only applies to prior employers not regulated by FMCSA)	✓		391.23(f)(1)	
DRUG AND ALCOHOL TESTING PROGRAM	* Drug and alcohol testing program policy receipt from the driver for the education materials that must explain elements in 382.601(b)	✓		382.601	Employment plus 2 years
	* A failed pre-employment drug test requires that a CDL vehicle driver indicate if they applied for and did not receive employment due to a failed drug test.	✓		40.25(j)	Employment plus 3 years
	* A driver consent for a full query requires the driver to have a Clearinghouse account prior to any safety-sensitive functions. "Prohibited" status is not allowed.	✓		382.703(a)	Retained in Clearinghouse
	* DOT pre-employment drug screen result received , or documentation of pre-employment exception received from former employer(s) per 382.301(b) and (c)	✓		382.301(a)	1 year from result date

¹See CDL CMV definition in 383.5

*Indicates the carrier must have before operating a CMV in commerce, if applicable.

**Indicates the carrier must have within 30 days of the hire date.

THE DQ INVENTORY

RECURRING QUALIFICATION	CDL CMV Drivers Only ¹	Check the box if applicable to your operation	Regulatory Citation	Retention Period
*Medical exam certificate (at time of hire and after each medical exam) for all non-CDL drivers and any medical variance/medical exemption (Part 381) or skilled performance evaluation (SPE) from FMCSA per 391.49			391.43(g)	3 years from the document date
*CDL/CLP proof of medical certification (at time of hire and after each medical exam). Medical examiners are not required to issue medical certificates to CDL drivers on and after June 23, 2025. CDL drivers should request a medical certificate as proof of the exam until the new certification is reflected on the MVR. Carriers can place a copy of the medical certificate in the DQ file and replace it with the MVR as allowed by the FMCSA waiver for up to 60 days; <u>or</u>	✓		391.23 (m)(2) (i)(C)	
*Current motor vehicle record (MVR) showing CDL/CLP driver's medical certification status in the DQ file or a medical certificate issued within the prior 60 days, as allowed by the FMCSA waiver, before the CDL driver operates a CMV.				
*Medical examiner on the registry note provides verification by a representative that the medical examiner was listed on the National Registry as of the date of the driver's DOT exam by a certified medical examiner (for exams conducted after May 20, 2014). On and after June 23, 2025, or after a CDL/CLP's licensing authority transitions to the National Registry Phase II (NRII) the Registry verification is not required, but is still required for non-CDL drivers.			391.51(b)(9)	Retained in the Clearinghouse
Annual motor vehicle record and review with company representative noted			391.25	
Annual limited query is required no later than one year from the date of hire and each year thereafter. Carrier must conduct at least a limited query in the Drug and Alcohol Clearinghouse.	✓		382.701(b)(2)	3 years from last query
Annual limited query consent form must be obtained outside of the Clearinghouse and may be of a specific duration, such as for the length of employment.	✓		382.703(a)	

¹See CDL CMV definition in 383.5

*Indicates the carrier must have before operating a CMV in commerce, if applicable.



THE DQ INVENTORY

DOCUMENTS FOR CERTAIN DRIVERS PRIOR TO OPERATING A CMV

	CDL CMV Drivers Only ¹	Check the box if applicable to your operation	Regulatory Citation	Retention Period
*Medical waiver if applicable, documentation of any variance, exemption, or waiver from the physical qualification standards at time of hire			391.51(b)(7)	3 years from the document date
*Longer combination vehicle (LCV) driver-training certificate if operating vehicle pulling double or triple sets of trailers	✓		380.401	Employment plus 3 years
Entry-level driver training (ELDT) certificate through February 6, 2022, for drivers hired with less than one year of CDL-vehicle driving. ELDT requirements changed February 7, 2022.	✓		380.509(b)	3 years from document date
*Multiple-employer driver DQ file exception — A driver must operate a CMV under at least two separate DOT numbers in each seven-day period. The "mini" DQ file must include: ☐ Proof of medical certification per 391.43(g); ☐ Road test form and certificate per §391.31(g), or a photocopy of a CDL or certificate accepted in lieu of road test per §391.33; ☐ Driver's name and social security number; and CDL or certificate accepted in lieu of road test per §391.33; ☐ Identification number, type, and issuing state of vehicle operator's license.			391.63	Employment plus 3 years
*Driver borrowed from a motor carrier for a driver who works for two DOT numbers in seven days and meets the criteria in §391.65(a), (a)(1), and (a)(2). A motor carrier may accept a certificate, completed by both the driver and primary employing motor carrier per the format in §391.65(a)(2). The carrier must verify the certificate's validity with primary carrier.			391.65	Employment plus 3 years

¹See CDL CMV definition in 383.5

*Indicates the carrier must have before operating a CMV in commerce, if applicable.

We Keep 'Em Qualified

Trust the Compliance Experts to Keep Your Driver Files Compliant

When your CMV drivers have missing, expired or incomplete driver qualification files, you run the risk of fines, penalties and liability. But with J. J. Keller, you never have to worry. We provide the industry's most in-depth DQ services, including:

- Driver Qualification File Management
- Driver Qualification File Audit
- MVR Monitoring
- Non-Regulated Driver File Management.



Discover how we go the extra mile to make sure you have qualified driver files. Contact us for a no obligation consultation.

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