

# Driver Qualification File Management

Standard Operating Procedure, sanitized sample

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**SAMPLE DOCUMENT.** Built from the published regulations and general practice to show format and rigor. It contains no client information and no client system. Regulatory citations were verified on 13 September 2026 and carry a currency note in Appendix B. They are not legal advice and do not replace the regulation.

## About This Sample

This procedure builds and maintains a driver qualification file. It is the most audited records set a motor carrier owns and the one most often found incomplete, usually not because anyone ignored it but because the file was assembled once at hire and then only touched when something expired.

Two design choices carry most of the weight here. The file is completed before the first dispatch rather than during the first month, and the annual cycle is a scheduled event with an owner rather than a reminder that fires when a certificate is already expired.

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## 1. Purpose

To ensure every driver operating a commercial motor vehicle for the company is qualified before the first dispatch, that the qualification file contains what the regulation requires, that the annual requirements are completed on schedule, and that the file is retained for the required period after the driver leaves.

## 2. Scope

- Applies to every driver the company employs or uses to operate a commercial motor vehicle in interstate commerce, including part-time, seasonal, and temporary drivers.
- Covers the hiring file build, the annual cycle, ongoing maintenance, and retention after separation.
- Drug and alcohol testing records and Clearinghouse query records are governed by 49 CFR Part 382 and are kept separately. They are not part of the driver qualification file under 49 CFR 391.51. This procedure covers only the queries as a hiring gate.
- Does not cover the hiring decision, compensation, or any employment matter outside driver qualification.

- Does not cover intrastate-only operations, which may be subject to different state requirements.
- Does not replace the regulation. Where this procedure and 49 CFR Part 391 disagree, the regulation governs and this procedure gets corrected.

### 3. Roles

| Role             | Owns                                                                              | Does not own                                   |
|------------------|-----------------------------------------------------------------------------------|------------------------------------------------|
| [Safety Owner]   | The file build, the annual cycle, the qualification determination, and retention. | The hiring decision itself.                    |
| [Hiring Manager] | Providing the applicant and the road test, and honoring the qualification gate.   | Dispatching a driver whose file is incomplete. |
| [Dispatcher]     | Dispatching only drivers shown as qualified.                                      | Overriding an unqualified status.              |
| [Records Owner]  | File security, access control, and the retention clock after separation.          | Determining qualification.                     |

Roles, not names. Driver qualification files contain personal and medical information. Access is limited to the roles named above, and the access list is reviewed at [interval].

### 4. Definitions

| Term                           | Meaning in this procedure                                                                                                                                                                       |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Driver qualification file      | The file required by 49 CFR 391.51, containing the items listed in 391.51(b).                                                                                                                   |
| Driving record                 | The motor vehicle record obtained from each State in which the driver held a license or permit during the relevant period.                                                                      |
| Annual review                  | The review of the driver's driving record required by 49 CFR 391.25, together with the note of that review retained in the file.                                                                |
| Medical examiner's certificate | The certificate issued under 49 CFR 391.43(g) by an examiner listed on the National Registry of Certified Medical Examiners.                                                                    |
| National Registry verification | The note confirming the medical examiner who issued the certificate was listed on the National Registry at the time of the examination.                                                         |
| Clearinghouse query            | A query of the FMCSA Drug and Alcohol Clearinghouse under 49 CFR 382.701. A full query releases information with the driver's consent; a limited query reports only whether information exists. |
| Qualified                      | A determination by the [Safety Owner] that the file is complete and contains no disqualifying result. Only a qualified driver may be dispatched.                                                |

## 5. Procedure

### 5.1 File build, before the first dispatch

| # | Action                                                                                                                                                                                                                        | Owner            | Evidence it happened                                                  |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-----------------------------------------------------------------------|
| 1 | Have the applicant complete the application for employment in full, per 49 CFR 391.21. An incomplete gap history is returned to the applicant, not filled in by staff.                                                        | [Safety Owner]   | Signed application in the file                                        |
| 2 | Request the driving record from every State in which the applicant held a license or permit during the required period, per 49 CFR 391.23(a)(1).                                                                              | [Safety Owner]   | Record from each State, with request dates                            |
| 3 | Send the safety performance history inquiries to previous employers required by 49 CFR 391.23, and record the date each was sent as well as the response or non-response.                                                     | [Safety Owner]   | Inquiry log with dates sent and responses                             |
| 4 | Run the pre-employment full Clearinghouse query under 49 CFR 382.701, with the driver's consent. File it in the Part 382 records, not in the qualification file.                                                              | [Safety Owner]   | Query record and response, retained per Part 382                      |
| 5 | Review every result returned. Any disqualifying result goes to stop gate G1.                                                                                                                                                  | [Safety Owner]   | Review note with the qualification determination                      |
| 6 | Administer the road test and issue the certificate per 49 CFR 391.31, or file the accepted equivalent under 49 CFR 391.33.                                                                                                    | [Hiring Manager] | Road test certificate or the accepted equivalent                      |
| 7 | Obtain and verify medical certification per 49 CFR 391.43, and record the note verifying the examiner was listed on the National Registry at the time of the examination. See Appendix B on current handling for CDL holders. | [Safety Owner]   | Certificate or qualifying record, plus the registry verification note |
| 8 | Confirm the file contains every item required by 49 CFR 391.51(b). An incomplete file goes to stop gate G2.                                                                                                                   | [Safety Owner]   | Completeness checklist, dated and signed                              |
| 9 | Mark the driver qualified and make that status visible to dispatch.                                                                                                                                                           | [Safety Owner]   | Status change with timestamp                                          |

## 5.2 Annual cycle

| #  | Action                                                                                                                                                                                          | Owner          | Evidence it happened                |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|-------------------------------------|
| 10 | On a scheduled date each year, request the current driving record from each State licensing authority, per 49 CFR 391.25(a).                                                                    | [Safety Owner] | Annual driving record in the file   |
| 11 | Review it and consider the driver's accident record and any violations, then place the note of that review in the file per 49 CFR 391.25(c)(2). The note is a required record, not a formality. | [Safety Owner] | Dated review note in the file       |
| 12 | Run the annual Clearinghouse query under 49 CFR 382.701. If a limited query shows information exists, complete a full query within 24 hours.                                                    | [Safety Owner] | Query record, retained per Part 382 |
| 13 | Confirm medical certification remains current and schedule the next examination before the current certification expires. An expired certification goes to stop gate G3.                        | [Safety Owner] | Next expiration date on the tracker |

## 5.3 Separation and retention

| #  | Action                                                                                                                                                                                              | Owner           | Evidence it happened                            |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------|
| 14 | On separation, close the file and start the retention clock. The file is retained for as long as the driver was employed and for three years after, per 49 CFR 391.51(c).                           | [Records Owner] | Separation date and calculated destruction date |
| 15 | Do not purge before the retention date. Where 49 CFR 391.51(d) permits removing certain records after three years, apply it deliberately and record what was removed, rather than purging by habit. | [Records Owner] | Purge log                                       |

## 6. Stop Gates

| ID | Condition                                                   | Action                                                                                                | Why it is a gate                                                                                                                                                                                                                       |
|----|-------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| G1 | A disqualifying result is returned by any check.            | The driver is not qualified and may not be dispatched. Record the determination and the basis for it. | The determination has to exist in writing. An undocumented decision not to hire looks the same in a file as a decision nobody made, and neither one helps the carrier later.                                                           |
| G2 | The qualification file is incomplete at the first dispatch. | No dispatch. Complete the file first.                                                                 | This is the single most common finding in a compliance review, and it is entirely a sequencing problem. A file finished in week three is a violation for every run in weeks one and two, no matter how complete it eventually becomes. |
| G3 | Medical certification has expired or cannot be verified.    | The driver comes off dispatch until certification is current and verified.                            | Medical certification is the requirement most likely to lapse quietly, because it expires on its own schedule rather than on the company's. That is exactly why it gets a scheduled owner in step 13.                                  |
| G4 | The annual cycle date passes with any item incomplete.      | Escalate the same week. Do not let the item roll into next year's cycle.                              | An annual requirement missed once usually becomes a permanent gap, because the next cycle assumes the previous one closed.                                                                                                             |

## 7. Exceptions

- Previous employer does not respond to a safety performance history inquiry. Record the date sent, the follow-up attempts, and the non-response. The record of a diligent inquiry is what the file needs when the answer never comes.
- Driver holds licenses from more than one State during the period. Request from each. A single-State record on a multi-State history is an incomplete file.
- Driver returns after a separation. Build a new file. Do not reactivate the old one, and do not carry forward a stale driving record or a lapsed medical certification.
- Short-term or seasonal driver. The requirements do not scale with the length of employment. The file is complete before the first dispatch regardless of how long the assignment is expected to last.
- Medical certification expires while the driver is out on leave. The driver does not return to dispatch until certification is current, whatever the reason for the absence.

## 8. Records and Retention

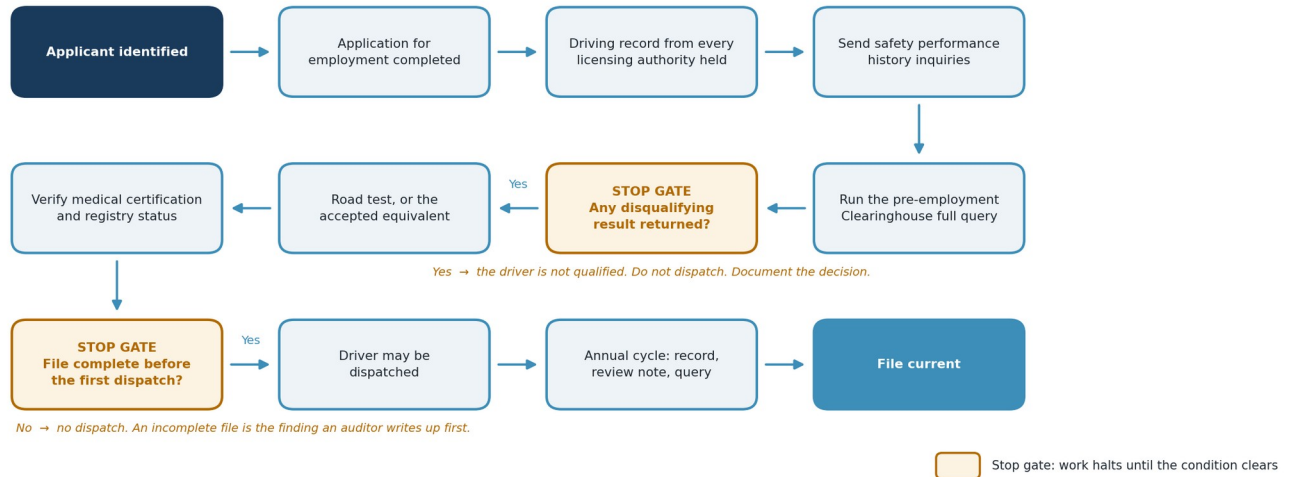
| Record                                                      | Stored at                             | Retention                                                                  | Owner           |
|-------------------------------------------------------------|---------------------------------------|----------------------------------------------------------------------------|-----------------|
| Driver qualification file, all items under 49 CFR 391.51(b) | [records location], access controlled | Duration of employment plus 3 years, per 49 CFR 391.51(c)                  | [Records Owner] |
| Annual driving record and review note                       | In the qualification file             | Per 49 CFR 391.51(c), with removal permitted after 3 years under 391.51(d) | [Safety Owner]  |

| Record                                                       | Stored at                         | Retention                                                                  | Owner          |
|--------------------------------------------------------------|-----------------------------------|----------------------------------------------------------------------------|----------------|
| Medical certification records and registry verification note | In the qualification file         | Per 49 CFR 391.51(c), with removal permitted after 3 years under 391.51(d) | [Safety Owner] |
| Clearinghouse query records                                  | Part 382 records, kept separately | 3 years, per 49 CFR 382.701                                                | [Safety Owner] |
| Safety performance history inquiry log                       | [records location]                | [period]                                                                   | [Safety Owner] |

## 9. Revision History

| Version | Date       | Change                                                                                                                                                 | Approved by                                    |
|---------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| 1.0     | 2026-09-13 | Sample release. Sanitized demonstration document, no client content. Citations verified against the eCFR current text and FMCSA notices on 2026-09-13. | Jacob Johnston, True North Data Strategies LLC |

## Appendix A. Process Flow



## Appendix B. Regulatory Basis

| Citation         | What it requires                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 49 CFR 391.51(b) | The contents of the driver qualification file: the application for employment under 391.21; the driving record obtained under 391.23(a)(1); the road test certificate under 391.31(e) or an accepted equivalent under 391.33; the annual driving record obtained under 391.25(a); the note of the annual review under 391.25(c)(2); the medical examiner's certificate required by 391.43(g) or a legible copy; any Skill Performance Evaluation certificate or medical variance; and the note verifying the medical examiner was listed on the National Registry. |
| 49 CFR 391.51(c) | The file is retained for as long as the driver is employed by the carrier and for three years thereafter.                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 49 CFR 391.51(d) | Certain records, including annual driving records, annual review notes, medical certificates and variances, and registry verification notes, may be removed from the file after three years.                                                                                                                                                                                                                                                                                                                                                                       |
| 49 CFR 391.23    | Investigation and inquiries, including the driving record request and the safety performance history inquiries to previous employers.                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 49 CFR 391.25    | The annual driving record inquiry and the annual review of the driving record, and the note of that review.                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 49 CFR 391.43    | The medical examination and the medical examiner's certificate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 49 CFR 382.701   | Clearinghouse queries: a full query before the driver performs safety-sensitive functions, and at least one query each year thereafter, which may be a limited query; if a limited query indicates information exists, a full query within 24 hours. Query records are retained for three years.                                                                                                                                                                                                                                                                   |

### Medical certification for CDL holders, current handling

Since 30 January 2012, for a driver required to have a commercial driver's license, a CDLIS motor vehicle record containing the driver's medical certification status has satisfied the certificate requirement in the qualification file. The mechanism behind that record has been moving: medical examination results now flow electronically from the National

Registry to the State licensing agencies, and that transition has produced a gap between the day a certificate is issued and the day it appears on the State record.

#### **Live item as of 13 September 2026**

FMCSA has issued a temporary waiver, not an exemption, allowing interstate CDL and CLP holders and their carriers to rely on a paper medical examiner's certificate as proof of medical certification for up to 60 days after issuance. The allowance was originally 15 days and was modified to 60. The current waiver period runs to 11 October 2026. Because a waiver is time-limited and has already been reissued and modified more than once, do not build this into a procedure as a standing rule. Confirm the waiver's current status on the FMCSA National Registry site before relying on it, and record the date of that check.

#### **Currency note**

Part 391 citations above were read against the eCFR current text on 13 September 2026; 391.51 showed an amendment dated 9 March 2022 at 87 FR 13209. The Clearinghouse citation was read the same day. FMCSA waiver status was read from FMCSA notices the same day. Regulations and waivers change. Before this procedure is adopted at an operation, confirm each citation and the waiver status, and record the date of that check in the revision history.

## **Appendix C. Why This Procedure Is Built This Way**

### **Complete before the first dispatch**

Gate G2 is the whole procedure in one line. Carriers rarely fail this requirement by refusing to build files. They fail it by building them on a normal administrative timeline while the driver is already running loads. Putting the gate at the first dispatch converts a paperwork task into an operational one, which is the only version that holds under pressure.

### **The annual cycle has an owner and a date**

An annual requirement with no scheduled date is a requirement that fires when something has already expired. Steps 10 through 13 are a calendar event with a named role, and gate G4 escalates in the same week rather than letting the item roll forward into a cycle that assumes it closed.

### **Part 382 records are kept separately, on purpose**

Clearinghouse and testing records are not part of the qualification file under 391.51, and mixing them creates two problems: a qualification file that contains records an auditor did not ask for, and testing records whose own retention clock gets managed by accident. Step 4 runs the query as a hiring gate and files it where it belongs.

### **Non-response is a record**

A previous employer who never answers is a common and permanent condition. The file cannot contain an answer that does not exist, so what it contains instead is proof of a diligent inquiry: dates sent, follow-ups, and the non-response recorded. Operations that leave the line blank end up looking like they never asked.

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This sample is provided by True North Data Strategies LLC to show the form of a delivered procedure. It is not legal advice and it does not replace 49 CFR Parts 382 and 391 or any applicable state requirement. In an engagement, the bracketed owners, intervals, and retention periods are filled from the operation as it actually runs and from the regulation as it reads on the date of the build.