

# 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 <sup>1</sup>	Check the box if applicable to your operation	Regulatory Citation	Retention Period
DRIVER APPLICATION	<b>*Driver application for employment</b> with all required elements completed and signed by the driver			391.21	Employment plus 3 years
	<b>*Additional 7 years of regulated employers</b> for CDL-vehicle drivers not required to be investigated under 391.23	✓		391.21(b)(11)	
ROAD TEST	<b>*Road test form and certificate</b> conducted by your motor carrier with the driver to receive a copy of the certificate also, <u>or</u>			391.31(g)	
	<b>*Exception: Road test certificate</b> conducted by another motor carrier within the past 3 years; <u>or</u>			391.33(a)(2)	
	<b>*Exception: Copy of a CDL accepted in lieu of road test</b> — 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	<b>**Original motor vehicle record (MVR)</b> from each licensing authority that issued the driver a license			391.23(a)(1) and (b)	
	<b>General employment verifications</b> 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)	
	<b>**Safety performance history request (SPHR)</b> 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	
	<b>**Written consent to request for drug and alcohol violation information</b> from prior employers and records of the <b>returned violation information</b> (only applies to prior employers not regulated by FMCSA)	✓		391.23(f)(1)	
DRUG AND ALCOHOL TESTING PROGRAM	<b>*Drug and alcohol testing program policy receipt</b> from the driver for the education materials that must explain elements in 382.601(b)	✓		382.601	Employment plus 2 years
	<b>*A failed pre-employment drug test</b> 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
	<b>*A driver consent for a full query</b> 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
	<b>*DOT pre-employment drug screen result received</b> , 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

<sup>1</sup> See 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.

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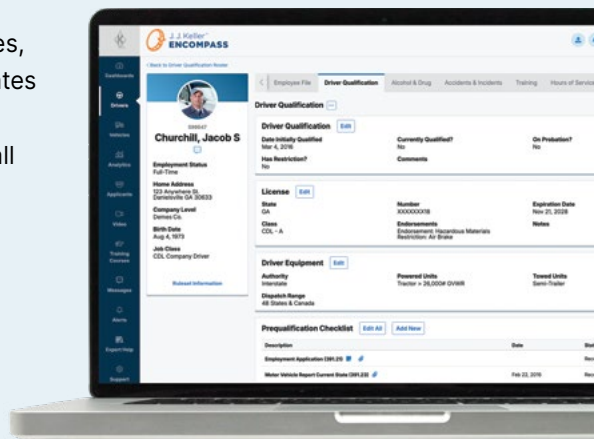
RECURRING QUALIFICATION	CDL CMV Drivers Only <sup>1</sup>	Check the box if applicable to your operation	Regulatory Citation	Retention Period
<b>*Medical exam certificate</b> (at time of hire and after each medical exam) for all non-CDL drivers and any medical variance/medical exemption (Part 381) or skilled performance evaluation (SPE) from FMCSA per 391.49			391.43(g)	3 years from the document date
<b>*CDL/CLP proof of medical certification</b> (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. <b>*Current motor vehicle record (MVR)</b> showing CDL/CLP driver's medical certification status in the DQ file after each medical certification and at-hire before operating a CMV.	✓		391.23 (m)(2) (i)(C)	
<b>*Medical examiner on the registry note</b> 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)	
<b>Annual motor vehicle record</b> and review with company representative noted			391.25	Retained in the Clearinghouse
<b>Annual limited query</b> 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)	
<b>Annual limited query consent form</b> must be obtained outside of the Clearinghouse and may be of a specific duration, such as for the length of employment.	✓		382.703(a)	

<sup>1</sup> See CDL CMV definition in 383.5

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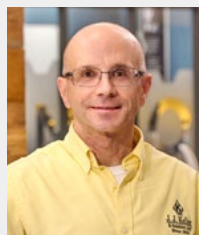
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## DOCUMENTS FOR CERTAIN DRIVERS PRIOR TO OPERATING A CMV

	CDL CMV Drivers Only <sup>1</sup>	Check the box if applicable to your operation	Regulatory Citation	Retention Period
<b>*Medical waiver</b> 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
<b>*Longer combination vehicle (LCV) driver-training certificate</b> if operating vehicle pulling double or triple sets of trailers	✓		380.401	Employment plus 3 years
<b>Entry-level driver training (ELDT) certificate</b> 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
<b>*Multiple-employer driver DQ file exception</b> — A driver must operate a CMV under at least two separate DOT numbers in each seven-day period. The “mini” DQ file must include: <ul style="list-style-type: none"> <li><input type="checkbox"/> Proof of medical certification per 391.43(g);</li> <li><input type="checkbox"/> 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;</li> <li><input type="checkbox"/> Driver’s name and social security number; and CDL or certificate accepted in lieu of road test per §391.33;</li> <li><input type="checkbox"/> Identification number, type, and issuing state of vehicle operator’s license.</li> </ul>			391.63	Employment plus 3 years
<b>*Driver borrowed from a motor carrier</b> 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

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Mark joined J. J. Keller & Associates, Inc. in June 2016 after spending 25 years in the transportation industry, with experience primarily in the operations, customer service, and finance areas. As a Senior Editor on the Transportation Publishing team, he is responsible for developing and updating content for existing materials, including the Everyday Transportation Safety Management manual and the Hours of Service Handbook, as well as developing new products and supporting customer solutions.

Mark’s primary areas of expertise include transportation operations and safety, driver retention, hours of service, and ELD requirements. He is also a frequent event speaker and helps customers with their regulatory issues. His articles have appeared in trade publications such as Heavy Duty Trucking and Organizational Health & Safety.

