Building your team

A smarter approach to driver recruitment, hiring and compliance

An AXA XL Environmental Whitepaper

Strategic steps for hiring the right Commercial Driver License (CDL) driver

The road to compliance: Understanding driver qualifications and risk

Strategic steps for hiring the right Commercial Driver License (CDL) driver

Introduction

When it comes to driver safety, the first and maybe the most important step, is the driver hiring process. The foundation of driver safety starts with the hiring process—arguably the most critical step. During this stage, management has the opportunity to screen out unsafe or high-risk candidates before they ever get behind the wheel. However, this important safeguard is often challenged by operational pressures and the urgent need to get “butts in seats”, which can make it tempting to overlook red flags.

Despite drivers’ indispensable contributions, recruiting reliable, skilled, and dedicated professionals remains an uphill battle for many companies. The industry is confronting a perfect storm of pressures—an acute shortage of qualified drivers, a graying workforce on the brink of mass retirements, and surging demand fueled by booming e-commerce and expanded delivery networks. These pressures shouldn’t be allowed to influence hiring a marginal employee.

Just remember, the driver you are hiring will be operating your vehicles, under your Department of Transportation (DOT) number, and covered by your insurance. As an owner or manager, it’s important to ask yourself: Am I truly comfortable with this driver operating my equipment? But here’s an even more telling question: Would I trust this individual to drive my personal vehicle—with my family inside?

You have identified a need for drivers, but what is the specific need?

- Are you looking for short-haul or long-haul drivers?
- Will drivers need to operate specialized equipment such as vacuum pumps?
- Will drivers start overnight, work weekends?
- Will drivers be delivering hazardous materials?
- Do new hires need specific CDL endorsements?
- Will the new hire be required to perform tasks beyond just driving?

Outline the specifics in the position description so it’s clear what you are looking for and applicants know what to expect before submitting an application.

Before going through the hiring process, it is a good idea to check with your insurance carrier to see if they have any specific hiring guidelines. As new driver(s) will be operating under your insurance, it is important to note that many insurance carriers have requirements drivers must meet to be insurable, otherwise they may end up on a watch list or worse deemed uninsurable.

Candidate screening process

With the job description finalized and your insurance requirements clearly defined, you're now prepared to move into the next phase: advertising the position and launching the candidate screening process. Below is a more detailed breakdown of the steps to help guide your efforts:

1. Require a comprehensive application with details about driving experience, accidents, traffic convictions, and any previous drug/alcohol test refusals. The Federal Motor Carrier Safety Administration (FMCSA) has a generic application which companies can use in the hiring process.

2. Obtain and verify the driver's CDL, ensuring it's valid and appropriate for the vehicle and cargo. Does the applicant have the necessary endorsements required for the position?

3. Conduct a full query pre-employment screening in FMCSA's Drug and Alcohol Clearinghouse. This database tracks violations related to drug and alcohol testing. You must check it during the hiring process to ensure the driver hasn't violated any substance-related policies. Drivers with unresolved violations are barred from operating commercial motor vehicles (CMVs).

4. Obtain and review the applicant's Motor Vehicle Record (MVR) to assess their driving history. Does the applicant's MVR meet your company and your insurance company's guidelines (number of accidents acceptable, number and types of violations acceptable).

5. Conduct a background check, including criminal history, driving history, and employment verification. Verify the driver's employment record for the preceding three years by contacting previous employers. Through this investigation, employers can gain valuable information on the applicant's dependability and adherence to safety protocols. Are there gaps in employment? If so, ask the applicant why.

6. Conduct an interview with the applicant. An in-person interview is preferred, but one by telephone or Zoom/Teams will do. Use the interview to expand on answers in the application. The interview is also a good tool to gauge the applicants communication skills and attitude. As a driver, the applicant will be expected to communicate with dispatch, maintenance, and customers. Also, with recent DOT requirements related to the ability to communicate in English with law enforcement, the interview should be used to ensure the new hire is able to effectively communicate.

DOT compliance requirements

Your applicant has successfully passed the initial screening—now it's time to move on to DOT compliance requirements. These aren't just mandatory regulations; they also serve as smart, practical screening measures to ensure safety, reliability, and legal alignment:

DOT Physical

Ensure the driver has passed a DOT physical exam, meeting medical qualifications. There are two schools of thought when it comes to a DOT physical, some companies will accept a current DOT medical card as sufficient. Others recommend having the driver complete a pre-employment physical even if their medical card is current. Having the driver complete a pre-employment physical will hopefully avoid any hidden injuries/illnesses the driver may have obtained since their last physical.

Pre-Employment Drug Test

A pre-employment drug test is a non-negotiable step and a core requirement under DOT regulations. Employers must ensure this test is conducted before extending any job offer, and any positive results must be reported to the FMCSA Drug & Alcohol Clearinghouse as required by law. Never make an offer of employment until you've received confirmed test results that show the driver is drug-free—compliance here protects your business and promotes safety on the road.

DOT Road Test

Administer a road test to assess the driver's skills and ability to operate YOUR equipment. Just because a driver has years of experience, doesn't mean they know how to operate all types of equipment. Since they will be operating your equipment, test them on your equipment.

Formal offer of employment

When the applicant has successfully met all the screening requirements, you're now ready to extend a formal offer of employment. As you move forward, keep in mind a few key considerations post-screening to ensure a smooth transition into the role and continued compliance:

Employment agreement
Have the driver sign an employment agreement or contract.

Insurance verification
Verify the driver can be added to the company's insurance policy and do so before they are permitted to drive.

Random drug testing
Add the new hire to your drug and alcohol testing program, including the random pool.

Set-up tracking for expiration dates
You will want to track expiration dates for key documents such as the applicant's CDL and Medical Card. You will also want to order an annual MVR on the driver.

Driver qualification file
Create a driver qualification file including the CDL, medical certificate, application, MVR, and other relevant documents. The DOT has a list of items they want to see in a driver's DOT file, follow this list. Any documents not on this list should be kept in a separate file (Personnel file).

Driver orientation
Provide initial training to the new hire. This is often a combination of in-house/classroom training and hands-on training with a driver trainer. An orientation training checklist/outline is recommended to confirm all new drivers are receiving all the required training. As the training is completed, it should be documented with the signatures of the trainer and trainee.

Driver recruitment should be treated as a critical pillar of your company's safety program — not a rushed decision driven by operational pressure. Avoid the temptation to hire simply to fill a seat; instead, invest the time to find a qualified and reliable candidate.

Making the right hire now will spare you costly accidents, legal expense, and operational headaches in the future. Keep the roads safe & stay safe!

The road to compliance: Understanding driver qualifications and risk

Introduction

An organization's drivers form the backbone of an operation. Beyond simply transporting goods, they embody an organization's brand reliability and professionalism. When nurtured and respected, they ensure businesses not only keep running, but flourishing in today's competitive landscape.

When an organization finds a driver it's eager to welcome aboard, they must conduct the hiring process with precision. A well-defined, systematic approach not only lays a strong foundation for the partnership but also guarantees adherence to every compliance requirement.

Compliance may not eliminate risk entirely, but it lays a critical foundation for any successful fleet safety program. In the event of accidents or claims, robust hiring practices and well-maintained driver files serve as evidence of a company's due diligence and commitment to risk management. A strong compliance record not only supports legal and operational defenses but also enhances driver satisfaction, helping attract and retain top talent. When corrective actions focus on lessons learned and ongoing training, they shift from being seen as punitive to empowering—and help foster a stronger safety culture across the company.

Ensuring that commercial truck drivers meet the Federal Motor Carrier Safety Administration (FMCSA) qualification standards is a vital duty for fleet managers, motor carriers, and owner-operators. Central to this process is the Driver Qualification (DQ) file, which serves as the official documentation verifying that each driver is legally authorized and medically certified to operate a commercial motor vehicle (CMV).

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FMCSA regulations (49 CFR 391.51) are designed to keep only qualified, responsible, and safety-conscious drivers on the road. These standards not only reduce accident risk and corporate liability, but also enhance overall highway safety. However, managing DQ files demands precision and diligence—requiring meticulous documentation, routine updates, and strict adherence to regulatory retention policies.

This document provides AXA XL clients with a comprehensive guide to hiring and onboarding top-tier drivers—empowering their business to operate efficiently while maintaining full compliance and promoting a stronger culture of safety.

Driver Qualification File

A Driver Qualification File (DQ file) is a mandatory compliance record under the Federal Motor Carrier Safety Regulations (FMCSRs). Every motor carrier must compile and maintain a separate DQ file for each commercial driver it employs, documenting that the driver is both legally authorized and medically qualified to operate a commercial motor vehicle (CMV).

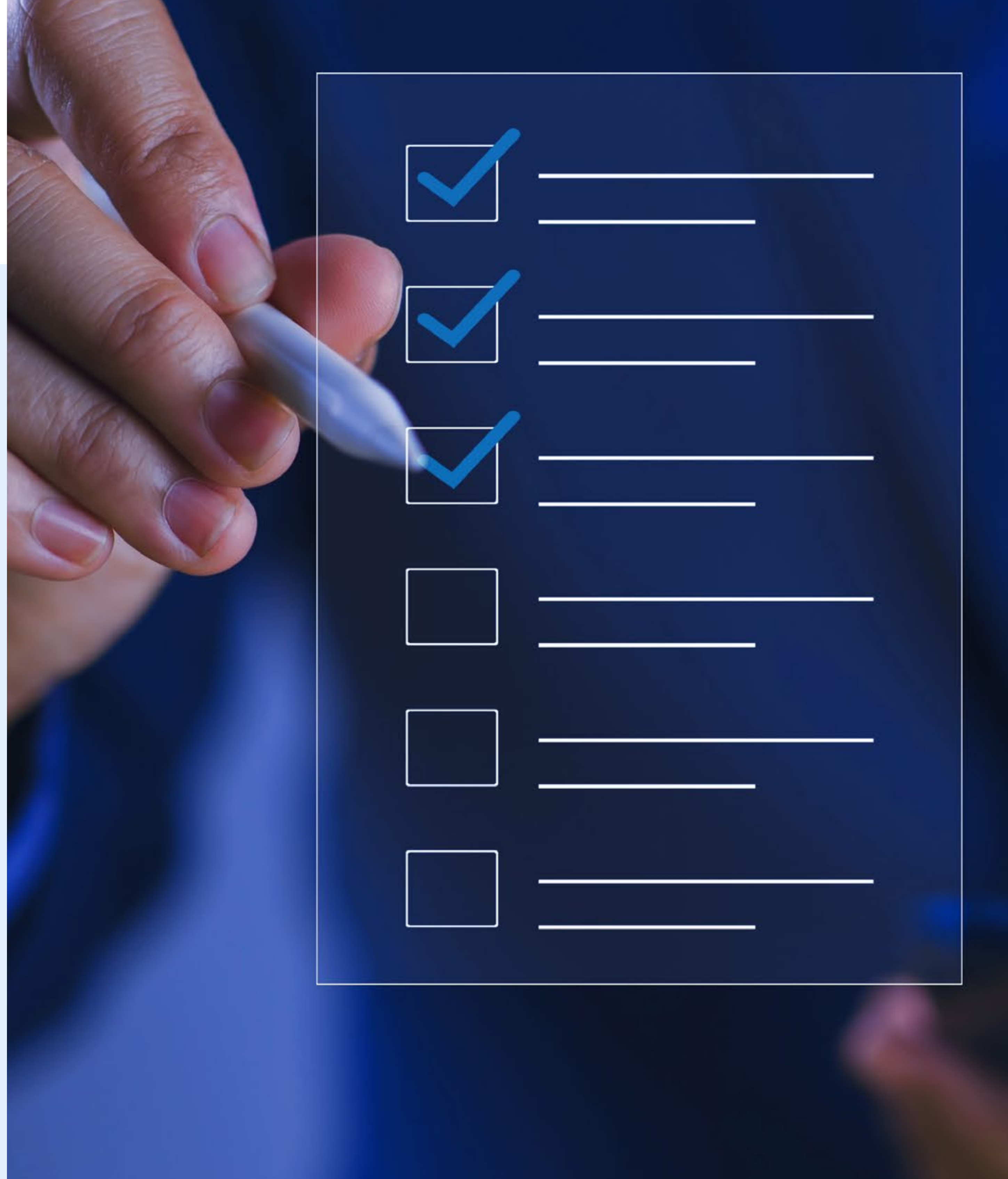
These regulations apply to any carrier, regardless of its size, that operates a vehicle in interstate commerce under any of the following conditions:

- Gross vehicle weight of 10,001 pounds or more
- Transportation of more than nine passengers
- Movement of materials classified as hazardous under the Hazardous Materials Transportation Act
- Owner-Operators – Independent drivers operating under their own authority must maintain a Driver Qualification File to stay compliant with FMCSA regulations.
- When partnering with third-party logistics providers or contract drivers, companies must ensure Driver Qualification Files are properly maintained—whether managed in-house or by the contractor.

Assurance of basic requirements before hire

In accordance with Federal Motor Carrier Safety Administration (FMCSA) regulations (and AXA XL requirements), every individual applying to operate a commercial motor vehicle must satisfy a defined set of criteria designed to protect public safety, ensure regulatory compliance, and maintain operational integrity.

Each of the following qualifications can be readily confirmed through submitted documentation, application materials, and a structured interview process:



- Potential drivers should be at least 25 years of age (AXA XL requirement)
- Drivers must have the ability to read and speak English. 49 CFR 391.11 mandates that drivers must possess sufficient English proficiency to:
  - Engage in conversations with the general public
  - Comprehend highway signs and signals
  - Respond appropriately to official inquiries
  - Complete entries on reports and records
- Successful completion of a road test
- Maintains a valid medical certificate
- Maintains a valid CDL license
- Understands cargo securement with regard to the materials being driven
- Provides the employer with a list of violations over the past 12 months
- Additional prerequisites:
  - no drug or alcohol offenses while on duty
  - no abandonment of the scene of an accident
  - no prior felonies while in use of a CMV

Driver Qualification File requirements

1

Application: Drivers must submit an employment application that incorporates every content element, question, and statement mandated by the applicable regulations. Generic or “standard” application forms are not allowed. (49 CFR 391.21 -- Application for employment.)

a. Business name and address
b. The applicant’s name, address, date of birth, and social security number
c. The addresses at which the applicant has resided during the 3 years preceding the date on which the application is submitted
d. The issuing driver’s licensing authority, number, and expiration date of each unexpired commercial motor vehicle operator’s license or permit that has been issued to the applicant
e. The nature and extent of the applicant’s experience in the operation of motor vehicles, including the type of equipment (such as buses, trucks, truck tractors, semitrailers, full trailers, and pole trailers) which he/she has operated
f. A list of all motor vehicle accidents in which the applicant was involved during the 3 years preceding the date the application is submitted
g. A list of all violations of motor vehicle laws or ordinances (other than violations involving only parking)
h. A declaration outlining the facts and circumstances of any denial, revocation, or suspension of a license, permit, or privilege to operate a motor vehicle—or, if none occurred, a certification to that effect.
i. A list of the names and addresses of the applicant’s employers during the 3 years preceding the date the application is submitted, reason for leaving, and was the applicant subject to the FMCSRs while employed by that previous employer. Also was their job designated as a safety sensitive function in any DOT regulated mode subject to alcohol and controlled substances testing requirements.
j. Provide the names and addresses of every commercial motor vehicle employer the applicant worked for in the seven years preceding the three-year period detailed above, along with the employment dates and reasons for departure.
k. Certification that the driver/applicant personally completed this application and that, to the best of their knowledge, all information provided herein is accurate and complete.

2

CDL (Commercial Driver’s License) Copy:
Employers must retain a clear copy of each driver’s Commercial Driver’s License (CDL) to verify legal authorization to operate a CMV. The CDL on file must also include all endorsements required for the assigned vehicle type (for example, hazmat, passenger, or tanker).

3

Medical Examiner’s Report:
Every commercial motor vehicle driver must undergo a DOT physical administered by an FMCSA-registered medical examiner. The resulting Medical Examiner’s Certificate—commonly called the DOT Medical Card—verifies the driver’s fitness to safely operate a CMV. Certificates are generally valid for up to two years, though specific medical conditions may require more frequent renewal.

4

Medical Examiners National Registry Verification:
The National Registry of Certified Medical Examiners was established to ensure that medical examiners are properly equipped to assess whether interstate CMV drivers meet FMCSA physical qualification standards. Consequently, any healthcare professional performing these physical exams must hold current FMCSA certification.

Driver Qualification File requirements (continued)

5

MVR (Motor Vehicle Report)- Initial and Annual:
Motor carriers must obtain a motor vehicle record from every state where a driver held a license in the past three years. The initial review confirms the driver's qualifications, and annual rechecks keep carriers informed of any new violations, suspensions, or disqualifications that could jeopardize the driver's authority to operate a CMV.

6

Road Test Certificate or CDL Certificate:
Non-CDL drivers must complete an FMCSA-mandated road test, with results documented on a Road Test Certificate. Drivers holding a valid CDL may be exempt from this requirement if their license carries all necessary endorsements for the assigned vehicle class. Employers are responsible for verifying and documenting those endorsements before assigning any CMV.

7

Safety Performance History:
Under FMCSA regulations, employers must examine each driver's employment history, safety performance, and drug-and-alcohol testing results for the past three years. This comprehensive review ensures that any serious safety violations, accidents, or substance abuse issues are identified and addressed before hiring.

8

Alcohol/Drug Testing:
Employers must ensure drivers adhere to FMCSA's drug and alcohol testing rules (eCFR : 49 CFR Part 382 -- Controlled Substances and Alcohol Use and Testing). This entails pre-employment drug screening, enrollment in a DOT random testing program, and thorough documentation of any positive or refused tests. Inaccurate or incomplete records can expose carriers to substantial FMCSA penalties.

9

Annual Review of Records:
Motor carriers must conduct an annual review of each driver's Motor Vehicle Record to evaluate their safety performance. This assessment confirms the absence of disqualifying offenses—such as DUI convictions, reckless driving citations, or excessive speeding—that could compromise the driver's legal qualification to operate a CMV.

10

Driver's Certification of Violations:
Drivers must annually self-certify and sign a list of all violations received over the prior 12 months in all states where they were operating. Employers should compare this to the annual MVR review to verify accuracy.

Under FMCSA regulations, employers must examine each driver's employment history, safety performance, and drug-and-alcohol testing results for the past three years.

Many organizations struggle to keep pace with evolving documentation requirements, annual reviews, and retention requirements—especially when also managing a fleet of contracted owner-operators. Overlooking FMCSA driver qualification file regulations can leave companies vulnerable to increased liability following an accident, as well as fines, compliance audits, and potential safety rating downgrades.

Common compliance violations

Missing or incomplete documents

One of the most common compliance lapses is leaving required documents out of a driver's qualification file. Omitting items like employment applications, current CDL copies, or complete drug and alcohol test records invites FMCSA penalties during an audit. Adopting a standardized checklist, digitizing all records, and conducting regular internal audits will help ensure nothing slips through the cracks

Failure to Conduct Annual MVR Reviews

FMCSA mandates an annual motor vehicle record (MVR) check for every driver. Overlooking this requirement can allow traffic violations, suspensions, or disqualifications to go unnoticed—putting safety and regulatory compliance at risk. Automated reminders, cross referencing MVR findings with a driver's Certificate of Violations, and scanning MVRs for red flags can assist organizational compliance with FMCSA standards.

Failure to Update Medical Certificates

All CDL drivers are required to maintain a valid Medical Examiner's Certificate. However, drivers with certain medical conditions may need to renew more frequently. An expired certificate can lead to the downgrade or suspension of a CDL, rendering the driver ineligible to operate a commercial motor vehicle (CMV). Using a digital compliance system to monitor expiration dates and prompting drivers to schedule exams early helps ensure timely renewals. Early alerts can prevent penalties enforced by the FMCSA and minimize disruptions to operations.

Driver qualification files are indispensable in the transportation industry, verifying that every driver adheres to stringent legal and safety standards. Whether an organization is meeting DOT qualification requirements or maintaining records for non-CDL operators, accurate documentation and diligent upkeep are paramount. Employers must uphold rigorous record-keeping practices to ensure compliance and protect both their workforce and the public. In this age of nuclear verdicts involving CDL drivers, additional focus on these compliance aspects can not only improve safety performance, but it can also help minimize claim severity and impacts to a company's bottom line.

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