

# CHECKLIST

## Compliance Requirements for Non-CDL Commercial Drivers and Fleets

Provided by:



Date:

Review conducted by:

Vehicles weighing between 10,001 and 26,000 pounds (e.g., straight trucks, box trucks, utility and service trucks, flatbed trucks, smaller buses or shuttles, pickups with trailers or cargo vans with heavy payloads) may not require a commercial driver's license (CDL), but they are still regulated as commercial motor vehicles under federal law when used in interstate commerce. Employers operating these fleets must comply with various Department of Transportation (DOT) and Federal Motor Carrier Safety Regulations (FMCSRs) safety, driver and vehicle requirements. This checklist can help ensure your operations meet federal standards and avoid costly penalties. Use it to stay organized, audit-ready and compliant.

DRIVER REQUIREMENTS	YES	NO	N/A
Are drivers at least 21 years old for interstate commerce and at least 18 years old for intrastate commerce?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the driver possess a valid driver's license ( <i>CDL required if transporting hazardous materials or 16+ passengers; FMCSRs must be followed for CDLs</i> )?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there a written safety program for company drivers that includes those who are not subject to the FMCSRs? This training must ensure that drivers are adequately trained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Do drivers receive proper safety training for operating company vehicles (e.g., <i>injury and accident reporting, emergency response to accidents, procedures on what to do if an accident occurs, defensive driving, cargo securement, distracted driving and cellphone use</i> )?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there a written drug and alcohol policy for all drivers operating company vehicles (10,001 or more pounds)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has the driver been provided with company policies, including company drug and alcohol policies and hour-of-service rules? ( <i>Check your state requirements, as certain states require drug and alcohol testing of drivers that operate vehicles under 26,001 pounds, especially if operating intrastate and transporting passengers or hazardous materials.</i> )	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If company drug and alcohol testing is required, is it being documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Do supervisors receive training in reasonable suspicion and procedures if there is a company drug and alcohol testing program requirement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DRIVER QUALIFICATION FILE REQUIREMENTS	YES	NO	N/A
Does the company create and maintain driver qualification files for all employees who drive company vehicles that are 10,001 pounds or more, transport hazardous materials, are paid to transport eight or more passengers, or transport 15 or more passengers unpaid?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*This checklist is merely a guideline. It is neither meant to be exhaustive nor meant to be construed as legal advice. It does not address all potential compliance issues with federal, provincial or local standards. Consult your legal counsel to address possible compliance requirements.* © 2025 Zywave, Inc. All rights reserved.

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Does the file contain an employment application?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the file contain the employee's motor vehicle record, including the initial and annual records?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there a road test or equivalent CDL documentation available, if applicable?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there a medical examiner's certificate (Fed Med Card)? Is it current?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is the driver's license and medical card checked annually?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Was a certificate issued by a certified medical examiner listed on the National Registry of Certified Medical Examiners?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has a skill performance evaluation been completed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there a skill performance evaluation certificate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is an annual review of the driving record completed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there documentation of the previous employer's safety performance history? <i>(A driver qualification inquiry to the previous employer is needed from the last three years.)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>HOURS OF SERVICE</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
Is the driver maintaining a record of duty status (or RODS), or are they eligible for a short-haul exemption?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there an electronic logging device used if operating outside the 150 air-mile radius or over eight days in a 30-day period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are the hours-of-service logs being reviewed and retained for at least six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are all receipts (full, toll receipts) retained for supporting documentation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has the driver been trained on the 11-hour driving limit, 14-hour on-duty limit and the 60/70 weekly limit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>VEHICLE REQUIREMENTS</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
Is the DOT number displayed on the vehicle (if operating in interstate commerce)? <i>*Employers should check to ensure that the state they are located in doesn't require a DOT number for intrastate operations; if so, they must have one.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is the name of the company displayed on the vehicle?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is the annual DOT inspection completed for the vehicle by a qualified inspector, and is there a sticker showing it was completed? Is it documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are daily vehicle inspection reports (DVIRs) being completed and retained for three months?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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Are corrections for the defects documented in the DVIRs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there a periodic maintenance program in place for vehicles, and are records retained for 12 months or six months after the vehicle is sold?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are the drivers completing pre- and post-trip inspections?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does each vehicle have a fire extinguisher?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does each vehicle contain warning devices (e.g., reflective triangles, fuses, liquid burning flares, if applicable)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the vehicle have an emergency kit that includes a first-aid kit, flashlight or reflective vest?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does each vehicle contain emergency contact numbers and information on what the driver should do if they are involved in an accident?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>INSURANCE REQUIREMENTS</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
Is there minimum public liability insurance coverage in place ( <i>\$750,000 for nonhazardous freight in interstate commerce, \$5 million for hazardous materials and \$300,000 for nonhazardous freight in vehicles under 10,001 pounds if part of a mixed fleet</i> )?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there proof of insurance filed with the Federal Motor Carrier Safety Administration (Form MCS-90)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>REGISTRATION AND PERMITTING</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
Is a U.S. Department of Transportation number obtained and updated every two years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is the Unified Carrier Registration completed annually?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are all state-specific registrations or permitting completed ( <i>e.g., vehicle registration, weight distance or usage tax, emissions, safety vehicle inspections, or fuel tax reporting under the International Fuel Tax Agreement [IFTA] for vehicles with three or more axles and operating in two or more IFTA jurisdictions</i> )?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If you are required to pay IFTA taxes, are you filing quarterly reports?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Accident Register and Reports</b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
Are accidents that involve a CMV that result in a fatality, bodily injury that requires medical treatment away from the scene, or one or more vehicles incurring disabling damage and requiring towing recorded?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the employer keep an accident register that includes the following: <ul style="list-style-type: none"> <li>• Date of the incident</li> <li>• City and state</li> <li>• Driver's name</li> <li>• Number of fatalities</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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<ul style="list-style-type: none"><li>• Number of injuries</li><li>• The occurrence of a hazardous materials release</li></ul>			
Have the accident reports from the police been obtained? Make sure to obtain reports completed by state, local or other governmental entities for each accident.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are these reports kept in a file separate from the driver qualification files?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are these reports stored either electronically or in paper form but readily accessible during audits, investigations or compliance reviews?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are the records retained for three years from the date of each accident?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>