

FMCSA SAFETY AUDIT PREPARATION GUIDE



BE PREPARED.



STAY COMPLIANT.



ORGANIZE RECORDS.



REDUCE RISK.



BE READY. STAY COMPLIANT. DRIVE WITH CONFIDENCE.



NEW ENTRANT

SAFETY AUDIT PREPARATION GUIDE

2026 UPDATED EDITION

Documents, records, links, and audit-readiness checklists

This guide updates and modernizes the Federal Motor Carrier Safety Administration Safety Audit Resource Guide for use in 2026. It preserves the original document categories while replacing obsolete technology, forms, procedures, and legacy links with current official resources.

Important

This is an independent updated preparation guide, not a replacement for the Federal Motor Carrier Safety Regulations, Hazardous Materials Regulations, an FMCSA audit request, or legal advice. Regulations and agency procedures control if they differ from this guide.

How to Use This Guide

Use this guide to organize the records an FMCSA or State auditor may request and to identify current official sources. The auditor may request additional records based on your operation, vehicle types, drivers, commodities, safety history, and applicable exceptions.

Start with the audit letter

Follow the audit notification and upload instructions you receive. The letter, portal instructions, and auditor requests take priority over this general checklist.

Core document groups

Done	Record	What to prepare
<input type="checkbox"/>	Driver roster	Current drivers, dates of birth and hire, license numbers, license States, and operating status.
<input type="checkbox"/>	Driver qualification	Licenses, applications, MVRs, medical status, road tests or accepted equivalents, annual reviews, and other qualification records.
<input type="checkbox"/>	Hours of service	ELD files or qualifying time records, supporting documents, and exception documentation.
<input type="checkbox"/>	Vehicles	Current and recently operated equipment lists, annual inspections, maintenance records, and repair documentation.
<input type="checkbox"/>	Drug and alcohol	Part 382 program records, pre-employment tests, random program enrollment, Clearinghouse queries, and return-to-duty records when applicable.
<input type="checkbox"/>	Insurance	Required financial responsibility filings and current coverage documentation.
<input type="checkbox"/>	Accidents	Accident register and supporting records for DOT-recordable crashes.
<input type="checkbox"/>	Hazardous materials	Shipping papers, training, registration, security plans, permits, and other records when applicable.

Current official starting points

New Entrant Program: <https://ai.fmcsa.dot.gov/NewEntrant/>

Motor Carrier Safety Planner: <https://csa.fmcsa.dot.gov/safetyplanner/>

Electronic Code of Federal Regulations: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III>

FMCSA Forms Library: <https://csa.fmcsa.dot.gov/safetyplanner/Resources/FormsLibrary.aspx>

New Entrant Program and Audit Timeline

A new interstate motor carrier is generally monitored as a New Entrant for 18 months. During this period, the carrier must operate safely, maintain required records, keep vehicles properly inspected and maintained, and pass a Safety Audit.

Typical timing

Under 49 CFR 385.307, a Safety Audit must generally be performed within 12 months after a property carrier receives its USDOT number and within 120 days for a motor carrier of passengers.

What the audit evaluates

- Whether the carrier has basic safety management controls that are operating effectively.
- Whether required driver, vehicle, hours-of-service, drug and alcohol, accident, insurance, and hazardous-materials records are available and compliant.
- Whether the carrier has committed a violation that can result in automatic failure under 49 CFR 385.321.
- Whether corrective action is required before permanent registration is granted.

If the carrier fails

FMCSA generally allows 60 days for most property carriers to demonstrate corrective action. Passenger carriers and certain hazardous-materials carriers generally have 45 days. The notice issued by FMCSA controls the deadline and required response.

49 CFR Part 385: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-385>

New Entrant Safety Assurance Program: <https://www.fmcsa.dot.gov/safety/new-entrant-safety-assurance-program>

FMCSA New Entrant online training: <https://www.fmcsa.dot.gov/carrier-safety/new-entrant/new-entrant-online-training>

Driver Records

1. Current driver list

Prepare a complete list of every driver currently employed or used to operate a commercial motor vehicle. Include enough information for the auditor to determine which qualification, licensing, medical, hours-of-service, and drug-and-alcohol requirements apply.

Done	Record	What to prepare
<input type="checkbox"/>	Driver name	First and last name.
<input type="checkbox"/>	Date of birth	Use the date shown in the qualification records.
<input type="checkbox"/>	Date of hire	Include the first date the driver performed safety-sensitive duties.
<input type="checkbox"/>	License	Number, issuing State, class, endorsements, restrictions, and expiration date.
<input type="checkbox"/>	Status	Active, inactive, intermittent, owner-operator, leased driver, or other applicable status.

2. License and qualification file

Each driver must be properly licensed for the vehicle and operation. A driver qualification file should contain the records required by 49 CFR Part 391, unless a documented exception applies.

- Application for employment meeting 49 CFR 391.21 requirements.
- Initial motor vehicle records and prior-employer safety performance inquiries.
- Road test certificate or an accepted equivalent under 49 CFR 391.33.
- Annual motor vehicle record and annual review documentation.
- Current medical qualification evidence applicable to the driver.
- Copies or records of waivers, exemptions, skill performance evaluation certificates, and applicable endorsements.

Commercial Driver License Program: <https://www.fmcsa.dot.gov/registration/commercial-drivers-license>

49 CFR Part 391: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-391>

Driver qualification forms and templates: <https://csa.fmcsa.dot.gov/safetyplanner/Resources/FormsLibrary.aspx>

Hours of Service and Electronic Logging Devices

Motor carriers must require drivers to accurately record duty status using the method required for the operation. For drivers subject to the ELD rule, use a compliant device appearing on FMCSA's registered ELD list. The former AOBDR transition ended in 2019 and should not appear in a current audit guide.

Prepare for the audit

Done	Record	What to prepare
<input type="checkbox"/>	ELD output	Transferable ELD files for the period and drivers specified by the auditor.
<input type="checkbox"/>	Supporting records	Fuel records, toll records, dispatch records, bills of lading, trip reports, payroll, receipts, and other records used to verify duty status.
<input type="checkbox"/>	Unassigned driving	Documentation showing review and assignment or annotation of unidentified driving events.
<input type="checkbox"/>	Edits and annotations	Records showing who edited the log, what changed, and whether the driver accepted or rejected the edit.
<input type="checkbox"/>	Malfunctions	Required malfunction notices, paper logs, repair documentation, and extension requests when applicable.
<input type="checkbox"/>	Exceptions	Time records and proof supporting any short-haul, driveaway-towaway, pre-2000 engine, or other claimed exception.

Short-haul time records

Drivers who meet a qualifying short-haul exception may use accurate time records instead of a standard record of duty status. Records must show the information required by the applicable exception and generally must be retained for six months. Confirm the exact property- or passenger-carrier rule that applies.

49 CFR Part 395: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-395>

FMCSA ELD home page: <https://www.fmcsa.dot.gov/hours-service/elds/electronic-logging-devices>

Registered ELD list: <https://eld.fmcsa.dot.gov/List>

Hours-of-service guidance: <https://www.fmcsa.dot.gov/regulations/hours-of-service>

Motor Vehicle Records and Medical Qualification

Annual motor vehicle records

Request an MVR from each licensing jurisdiction as required, review it to determine whether the driver remains qualified, and retain the MVR and review documentation in accordance with 49 CFR 391.25 and 391.51. The annual review must be completed at least once every 12 months.

Medical qualification in 2026

For CDL and CLP drivers, National Registry II electronically transmits medical examination results to State Driver Licensing Agencies for posting to the driver record. Carriers should verify medical qualification through the current MVR or CDLIS-based record as required. Non-CDL drivers subject to Part 391 may still require the Medical Examiner's Certificate to be maintained in the qualification file.

Temporary paper reliance

FMCSA has used temporary waivers during the National Registry II transition. Do not hard-code an expired waiver into company policy. Check the current FMCSA National Registry and waiver pages whenever a State record is delayed.

Audit-ready records

- Current MVR showing medical certification status for CDL/CLP drivers.
- Current Medical Examiner's Certificate when required for a non-CDL driver or permitted as temporary proof under a current waiver.
- Medical variance, exemption, or skill performance evaluation documentation when applicable.
- Documentation that examinations were performed by an examiner listed on the National Registry.

National Registry II Learning Center: <https://nationalregistry.fmcsa.dot.gov/nrilearning-center>

National Registry search: <https://nationalregistry.fmcsa.dot.gov/NRPublicUI/home.seam>

Medical Examiner Certificate Form MCSA-5876: <https://www.fmcsa.dot.gov/regulations/medical/medical-examiners-certificate-commercial-driver-medical-certification>

49 CFR Part 391 Subpart E: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-391/subpart-E>

Vehicle Records and Maintenance

1. Vehicle list

Prepare a list of each power unit, trailer, converter dolly, and other commercial motor vehicle operated during the period requested. Include leased and rented equipment when it was under the carrier's control.

Done	Record	What to prepare
<input type="checkbox"/>	Unit number	Company equipment identifier.
<input type="checkbox"/>	VIN	Full vehicle identification number.
<input type="checkbox"/>	Plate	License plate number and State.
<input type="checkbox"/>	Description	Year, make, model, vehicle type, and GVWR or GVWR range.
<input type="checkbox"/>	Operation dates	Date placed in service and date removed, sold, returned, or transferred when applicable.
<input type="checkbox"/>	ELD information	ELD make/model or exception basis for power units when relevant.

2. Inspection, repair, and maintenance

Every commercial motor vehicle subject to Part 396 must be systematically inspected, repaired, and maintained. Each vehicle in a combination must have a qualifying periodic inspection at least once during the preceding 12 months.

- Annual or periodic inspection report and proof carried on the vehicle as required.
- Inspector qualification documentation.
- Maintenance records identifying the vehicle, nature and due date of inspections and maintenance, and records of repairs.
- Driver vehicle inspection reports when required, including defect correction and certification.
- Roadside inspection reports and documentation showing defects were corrected within required timeframes.

49 CFR Part 396: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-396>

Periodic inspection rule: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-396/subpart-B/section-396.17>

Appendix G minimum inspection standards: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-396/appendix-Appendix%20G%20to%20Subchapter%20B%20of%20Chapter%20III>

Hazardous Materials Records

This section applies only when the carrier transports hazardous materials subject to the Hazardous Materials Regulations. The auditor may request more than shipping papers, depending on the materials, quantities, packaging, routes, and permits involved.

Potential audit records

Done	Record	What to prepare
<input type="checkbox"/>	Shipping papers	Complete basic description, quantity, package information, emergency response telephone number, and required certifications.
<input type="checkbox"/>	Retention	Shipping papers retained for the applicable period, including longer retention for hazardous waste.
<input type="checkbox"/>	Training	Current general awareness, function-specific, safety, security-awareness, and in-depth security training records as applicable.
<input type="checkbox"/>	Registration	PHMSA hazardous-materials registration when required.
<input type="checkbox"/>	Security plan	Written plan and related training when required by 49 CFR Part 172 Subpart I.
<input type="checkbox"/>	Permits	FMCSA Hazardous Materials Safety Permit and route-plan records when applicable.
<input type="checkbox"/>	Vehicle operation	Placards, marking, parking, attendance, routing, loading, unloading, and incident records as applicable.

49 CFR Parts 171-180: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-I/subchapter-C>

FMCSA hazardous materials resources: <https://www.fmcsa.dot.gov/regulations/hazardous-materials>

PHMSA hazardous materials information: <https://www.phmsa.dot.gov/standards-rulemaking/hazmat>

Hazardous Materials Safety Permit: <https://www.fmcsa.dot.gov/registration/hazardous-materials-safety-permit-program-hmsp>

Financial Responsibility and Insurance

Motor carriers must maintain the level of financial responsibility required for the type of operation, vehicle, passenger capacity, and commodities transported. Required filings are commonly submitted electronically by the insurer or surety and must remain active.

Prepare

- Current insurance policy or certificate showing the carrier name, policy number, effective dates, and limits.
- Applicable FMCSA filing status, such as BMC-91, BMC-91X, BMC-34, BMC-84, or BMC-85.
- MCS-90 or MCS-90B endorsement when required.
- Lease agreements and evidence identifying which party is responsible for coverage when equipment is leased.
- Proof of higher limits required for passengers, hazardous materials, household goods, or other specialized operations.

Use current forms

Do not reuse the expired 2017 MCS-90 image from the older guide. Obtain the current form and filing instructions from FMCSA.

Financial responsibility requirements: <https://www.fmcsa.dot.gov/registration/insurance-filing-requirements>

FMCSA Licensing and Insurance public search: https://li-public.fmcsa.dot.gov/LIVIEW/pkg_carrquery.prc_carrlist

Current MCS-90 information and form: <https://www.fmcsa.dot.gov/registration/form-mcs-90-endorsement-motor-carrier-policies-insurance-public-liability-under>

49 CFR Part 387: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-387>

Drug and Alcohol Program and Clearinghouse

A motor carrier that uses drivers subject to the CDL requirements of 49 CFR Part 383 must implement a drug and alcohol testing program meeting Parts 40 and 382. Owner-operators must participate through a consortium/third-party administrator for random testing.

Audit-ready program records

Done	Record	What to prepare
<input type="checkbox"/>	Policy	Written policy distributed to covered drivers and supervisor training records when required.
<input type="checkbox"/>	Pre-employment	Negative controlled-substances test result before first safety-sensitive duty, unless a documented exception applies.
<input type="checkbox"/>	Random program	Enrollment records, current driver pool, selections, completed tests, and consortium records.
<input type="checkbox"/>	Post-accident	Decision records and test results, or documentation explaining why testing was not performed within required periods.
<input type="checkbox"/>	Reasonable suspicion	Supervisor observations, training, referrals, and results.
<input type="checkbox"/>	Return-to-duty	Substance Abuse Professional process, negative return-to-duty test, follow-up plan, and completed follow-up tests.
<input type="checkbox"/>	Record security	Controlled access and retention for the periods required by 49 CFR 382.401.

Drug and Alcohol Clearinghouse

- Conduct a full pre-employment query before permitting a covered driver to perform safety-sensitive functions.
- Conduct an annual query for every covered driver within the required rolling 12-month period.
- Obtain the required driver consent for limited and full queries.
- Report violations and return-to-duty information when the employer is responsible for reporting.
- Do not permit a driver with a prohibited Clearinghouse status to perform safety-sensitive functions.

FMCSA Drug and Alcohol Clearinghouse: <https://clearinghouse.fmcsa.dot.gov/>

Clearinghouse employer requirements: <https://clearinghouse.fmcsa.dot.gov/FAQ/Topics/Employer>

49 CFR Part 382: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-382>

DOT 49 CFR Part 40: <https://www.transportation.gov/odapc/part40>

Accident Register and Crash Records

Maintain an accident register for crashes meeting the federal definition of an accident in 49 CFR 390.5T. The register and copies of accident reports required by a governmental entity or insurer must be retained for three years after the date of the crash.

Required register information

- Date of the accident.
- City or town nearest the accident and the State.
- Driver name.
- Number of injuries and fatalities.
- Whether hazardous materials, other than fuel from the vehicle fuel tanks, were released.

Supporting file

- Police or governmental crash report.
- Insurance and claim documents requested by the auditor.
- Drug and alcohol post-accident testing decision and results when applicable.
- Internal investigation, photographs, witness information, corrective actions, and training records.
- Vehicle repair and inspection records following the crash.

Do not confuse time periods

An audit request may focus on recent crashes, but the federal accident register retention period is three years.

49 CFR 390.5T accident definition: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-390/subpart-A/section-390.5T>

49 CFR 390.15 accident register: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-390/subpart-A/section-390.15>

Automatic-Failure Risks

Certain violations can cause a New Entrant to fail the Safety Audit automatically. Review the current text of 49 CFR 385.321 before the audit. The following are common high-risk areas, but this summary is not a substitute for the regulation.

- Using a driver known to have a suspended, revoked, or canceled CDL, or a driver who is disqualified.
- Using a driver without a valid CDL when one is required.
- Using a medically unqualified driver.
- Failing to implement required drug and alcohol testing, including pre-employment testing.
- Operating without required financial responsibility.
- Operating a vehicle declared out of service before required repairs are completed.
- Failing to repair out-of-service defects reported in roadside inspections.
- Knowingly using a driver who has tested positive, refused testing, or has not completed the return-to-duty process.
- Certain hazardous-materials violations, including operating without a required safety permit.

Management review

Before submitting audit records, have a knowledgeable person review every active driver, vehicle, ELD, drug-and-alcohol record, insurance filing, and out-of-service repair. Missing records can indicate that the underlying safety control is not operating.

49 CFR 385.321: <https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-385/subpart-D/section-385.321>

Final Audit Submission Checklist

Done	Record	What to prepare
<input type="checkbox"/>	Audit notice	Read the entire notice, due date, requested period, driver sample, and submission method.
<input type="checkbox"/>	File names	Use clear names such as Driver_Smith_MVR_2026-05-10.pdf or Unit_101_Annual_Inspection_2026-02-14.pdf.
<input type="checkbox"/>	Legibility	Confirm every page is upright, complete, readable, and includes all signatures and dates.
<input type="checkbox"/>	Date coverage	Confirm logs, time records, tests, inspections, and policies cover the exact period requested.
<input type="checkbox"/>	Consistency	Compare driver names, hire dates, licenses, vehicles, ELD records, payroll, fuel, dispatch, and supporting documents.
<input type="checkbox"/>	Exceptions	Include written evidence supporting every claimed exception.
<input type="checkbox"/>	Defect correction	Include proof that roadside and inspection defects were repaired and certified.
<input type="checkbox"/>	Clearinghouse	Confirm pre-employment and annual queries are complete for every covered driver.
<input type="checkbox"/>	Medical status	Confirm current MVR medical status or other valid proof for each subject driver.
<input type="checkbox"/>	Portal confirmation	Save the upload receipt, confirmation page, email, or other proof of timely submission.
<input type="checkbox"/>	Follow-up	Respond promptly to auditor questions and preserve copies of everything submitted.

Recommended folder structure

1. 01 - Audit Notice and Correspondence
2. 02 - Driver Roster and Qualification Files
3. 03 - Hours of Service and Supporting Documents
4. 04 - Drug and Alcohol and Clearinghouse
5. 05 - Vehicle List, Inspections, and Maintenance
6. 06 - Insurance and Authority
7. 07 - Accident Register and Crash Files
8. 08 - Hazardous Materials Records
9. 09 - Policies, Training, and Corrective Actions

Verified Official Resources

These links were selected to replace legacy or date-specific links in the older guide. They point to current official federal resources and are more likely to remain stable than archived eCFR or old FMCSA URL structures.

FMCSA New Entrant Program: <https://ai.fmcsa.dot.gov/NewEntrant/>

New Entrant overview guide: <https://ai.fmcsa.dot.gov/NewEntrant/MC/Overview.aspx>

Motor Carrier Safety Planner: <https://csa.fmcsa.dot.gov/safetyplanner/>

Safety Planner Forms Library: <https://csa.fmcsa.dot.gov/safetyplanner/Resources/FormsLibrary.aspx>

FMCSA regulations and guidance: <https://www.fmcsa.dot.gov/regulations>

Current eCFR Title 49: <https://www.ecfr.gov/current/title-49>

Electronic Logging Devices: <https://www.fmcsa.dot.gov/hours-service/elds/electronic-logging-devices>

Registered ELD list: <https://eld.fmcsa.dot.gov/List>

Drug and Alcohol Clearinghouse: <https://clearinghouse.fmcsa.dot.gov/>

National Registry of Certified Medical Examiners: <https://nationalregistry.fmcsa.dot.gov/NRPublicUI/home.seam>

National Registry II Learning Center: <https://nationalregistry.fmcsa.dot.gov/nriilearning-center>

FMCSA hazardous materials: <https://www.fmcsa.dot.gov/regulations/hazardous-materials>

PHMSA hazardous materials: <https://www.phmsa.dot.gov/standards-rulemaking/hazmat>

FMCSA insurance filing requirements: <https://www.fmcsa.dot.gov/registration/insurance-filing-requirements>

FMCSA contact center: <https://www.fmcsa.dot.gov/registration/ask-fmcsa>

Link maintenance

Web addresses and agency procedures can change. Recheck this resource page at least annually and before publishing or distributing the guide.

Appendix D - Annual Review Checklist

Done	Record	What to prepare
<input type="checkbox"/>	Driver roster	Confirm all current and intermittent drivers are listed.
<input type="checkbox"/>	Licenses	Verify class, endorsements, restrictions, expiration dates, and disqualification status.
<input type="checkbox"/>	MVRs	Order and review annual MVRs and document the review.
<input type="checkbox"/>	Medical	Verify current medical status using the required record source.
<input type="checkbox"/>	Clearinghouse	Complete annual queries for every covered CDL driver.
<input type="checkbox"/>	Random pool	Reconcile the random testing pool with the active covered-driver list.
<input type="checkbox"/>	ELDs	Confirm devices remain on the registered list and review unassigned-driving controls.
<input type="checkbox"/>	Vehicles	Schedule annual inspections and reconcile the vehicle roster with maintenance records.
<input type="checkbox"/>	Insurance	Confirm required policies and FMCSA filings remain active.
<input type="checkbox"/>	Accidents	Update the three-year accident register and associated files.
<input type="checkbox"/>	Hazmat	Confirm training, registration, permits, security plans, and shipping-paper retention.
<input type="checkbox"/>	Links and policies	Review agency updates and revise company policies and this guide as needed.