

The Auto-Fail Checklist

How to use this page. Go down the list. Every "no" is not a to-do item: it's THE to-do item.

Two of the sixteen work differently, and it matters both ways. Fourteen are single-occurrence: one instance fails the audit. Two, records of duty status (§395.8(a)) and periodic inspections (§396.17(a)), carry a **51% threshold**, so the auditor is looking at what share of the records or units he pulled came back bad. That cuts in both directions. Don't tell yourself one late annual inspection has already ended your audit; it hasn't. And don't tell yourself a threshold is a cushion, because on a small fleet the share moves fast: at three units, two lapsed inspections is 67%.

Drug & alcohol program (Chapter 4)

- ☐ We have an alcohol and/or controlled substances testing program: enrollment certificate in hand, not assumed
- ☐ We have a functioning RANDOM testing program
- ☐ No driver in a safety-sensitive function known to have an alcohol concentration of 0.04 or higher
- ☐ No driver in service who refused a required test
- ☐ No driver in service known to have tested positive

Driver qualification (Chapter 3)

- ☐ Every driver holds a valid CDL for the vehicle class driven
- ☐ **** No driver operating on a **suspended, revoked or cancelled** CDL or CLP. This is not the same as "no valid CDL" and not the same as "disqualified." A driver whose license was suspended last month passes both of those boxes and fails this one.
- ☐ No disqualified driver allowed, required or permitted to drive
- ☐ No disqualified driver used. The table carries both this and §383.51(a) as separate rows; keep both boxes
- ☐ Every driver is medically qualified

Operations & records (Chapters 5, 8)

- ☐ Required insurance in force: no operating without minimum financial responsibility
- ☐ **** If you carry **passengers**: the passenger-carrier minimums are in force, a separate row from §387.7(a), and the insurance box above does not cover it
- ☐ Records of duty status are required and kept: **51% threshold row**

Vehicles (Chapter 6)

- ☐ No vehicle operated after being placed out of service until the defect was repaired
- ☐ **** No vehicle operated again with an **out-of-service defect listed on a driver's DVIR** left uncorrected, the DVIR version of the box above, and a separate row. Chapter 6 teaches this chain in full; v1 of this page had a box for the roadside version and none for the DVIR one.

- ☐ Periodic/annual inspection current on every unit: **51% threshold row**. Per unit, not per company: the trailer behind the building counts.

On false logs. Falsification is not on this table, and it is the last thing you should relax about; \$390.35 reaches the carrier and its officers, not just the driver who wrote the log, and Chapter 1's rule holds: missing costs money, fake costs everything. It just isn't scored here.

The pattern worth noticing: every item is a version of the Short List, a required system that doesn't exist, or a person or truck that shouldn't be in service. Build Chapters 3–6 and this page checks itself.