

RISK SIMPLIFIED

RESOURCES

[California DMV EPN](#)

[Risk Simplified: California Employer Pull Notice \(EPN\) Program](#)

[Form INF 1102 - EPN Enrollment of Out-of-State Licensed Drivers](#)

[Code of Federal Regulations: 391.25 Annual Inquiry and Review of Driving Record](#)

QUESTIONS

[Email PRISM Risk Control](#)
or call 916.850.7300

Overseeing Out-of-State Drivers

by Kristin Skorka

For California public agencies, ensuring that employees who operate vehicles are properly licensed and safe to drive is more than good policy, it's a public safety obligation. Whether drivers are transporting passengers, or traveling between job sites, every trip carries the agency's reputation and liability. The California Department of Motor Vehicles (DMV) administers the Employer Pull Notice (EPN) Program to help agencies monitor the driving records of employees who operate motor vehicles as a part of their job duties. The EPN Program was established to provide employers with timely notifications when a driver's California license record is updated with reportable actions such as convictions, suspensions, revocations, accidents, or failures to appear in court.

However, the EPN Program does not function the same way for employees who hold driver's licenses issued by other states. These out-of-state license holders are not connected to the DMV's automated notification system, which means their driving records are not actively monitored or updated through the EPN platform. This creates a critical oversight gap. Without additional administrative measures, agencies may remain unaware of serious violations, disqualifications, or suspensions that occur outside of California.

To help close this gap and maintain consistency for all employees who drive on behalf of the agency, the following steps are required:

Step 1: Submit Form INF 1102 – EPN Enrollment of Out-of-State Licensed Drivers

To enroll out-of-state drivers within the EPN framework, employers must complete and submit Form INF 1102. This form captures essential information such as the driver's full name, date of birth, and the issuing state of their license.

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- The form must be completed and signed by both the employer and the driver.
- Once processed, the DMV will assign the driver a unique index number that begins with an 'X'.
- This "X" number links the driver to the employer and allows for limited monitoring through the EPN program.
- The DMV will report any violations or incidents involving the driver that occur within California and those that are reported to the DMV by the licensing state, such as a citation issued while driving in California.
- The DMV will not report violations or incidents that occur outside California and are not reported. This includes license status changes such as suspensions and expirations of out-of-state license holders.

Step 2: Request Motor Vehicle Records (MVRs) from the Licensing State

Since the California DMV does not track driving activity in other states, it is considered best practice to request the driver's MVR directly from their licensing state. These records provide any violations, suspensions, or other infractions that would otherwise go unnoticed.

- Request an MVR at the time of hire to verify the driver's qualifications.
- Continue requesting the MVRs periodically throughout employment (e.g., annually or quarterly)
- These records should be reviewed, evaluated, and retained.

While California's EPN Program does not track out-of-state drivers through its standard system, agencies still have effective tools to stay proactive. By enrolling these drivers using Form INF 1102 and routinely requesting MVRs from the state that issued the license, agencies can help verify driver eligibility, support roadway safety, and reduce risk. For questions regarding the oversight of out-of-state drivers in the EPN, contact PRISM's [Risk Control](#).