

# The rise of non-domiciled CDL issuance in the United States

A state-by-state examination



**OVERDRIVE**

Reported by Executive Editor Alex Lockie



Transportation Secretary Sean Duffy ON Friday, June 27, announced a “nationwide audit” of non-domiciled CDLs, or CDLs states can issue to non-citizens in the country with temporary work authorizations, and the “potential for unqualified individuals obtaining licenses and posing a hazard on our roads.”

Later, the Federal Motor Carrier Safety Administration made it clear to *Overdrive* what it hopes to accomplish with the audit.

“To prevent the exploitation of foreign labor and protect the integrity of commercial driver licenses (CDLs), Secretary Duffy directed FMCSA to conduct a nationwide audit of states issuing non-domiciled CDLs,” a spokesperson for the FMCSA said. FMCSA’s review of these non-domiciled CDLs “will identify and eliminate patterns of abuse and help ensure all states are following federal regulations so that only qualified, properly documented drivers are getting behind the wheel of a truck.”

Historically, FMCSA has denied tracking non-domiciled CDL issuance numbers. The regulatory body wasn’t alone in that. The Commercial Vehicle Safety Alliance of law enforcement and industry, the American Association of Motor Vehicle Administrators, U.S. Citizenship and Immigration Services, the Department of Labor ... none of them were able to respond to questions asking how many non-citizens had received CDLs or work in truck driving in the U.S.

Since CDL issuance is the province of state governments, and no one at the national level seemed able to nail down the numbers, *Overdrive* began a process that would ultimately engage all 50 states’ driver’s licensing agencies and/or other responsible departments.

The result is this report, a review of non-domiciled CDL issuance that includes actual counts and begins to answer key questions: How many such licenses are out there? Is the number growing? Readers can for the first time access a state-by-state breakdown of where these licenses have been issued, in some instances how many are in force now, and plenty more context around states’ CDL issuance practices.

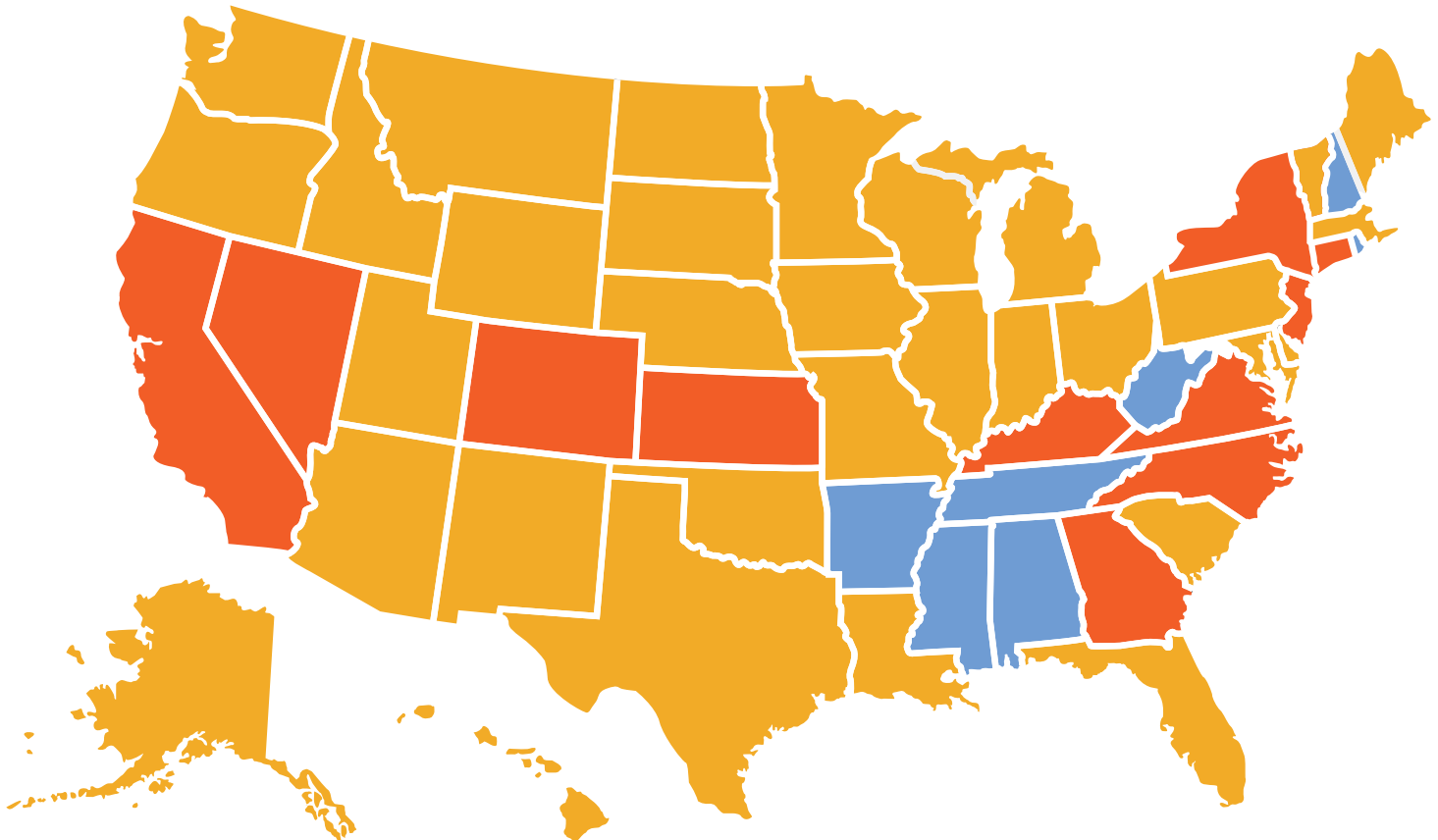
*Overdrive* found just seven states that don’t issue CDLs to non-citizens with work authorization; 11 states do issue non-domiciled CDLs but can’t readily produce data about them; and 32 states ultimately did provide numbers. Among the states that didn’t provide data, six said they would have to pay a contractor to produce the data, and two offered no response at all.

With DOT Secretary Duffy’s announcement of the FMCSA’s audit, he framed the investigation as part of the Trump administration’s “commitment to safety,” saying the policies of the Biden administration “allowed millions to flood our country -- leading to serious allegations that the trucking licensing system is being exploited.”

Duffy said the audit is “about protecting the safety of families on the road and upholding the integrity of CDLs held by America’s truckers. Every state must follow federal regulations, and ensure only qualified, properly documented drivers are getting behind the wheel of a truck.”

FMCSA needs to review all 50 states’ procedures for issuing non-domiciled CDLs to “identify and stop any patterns of abuse and ensure federal standards are being met across the country,” according to DOT’s release announcing the audit.

# States' non-domiciled CDL issuance



■ DOES Issue NDCDLs, No Data ■ DOES Issue NDCDLs, Data ■ DOES NOT Issue NDCDLs

*Overdrive* asked all 50 states, with a little variation, these three questions:

1. Does your state issue non-domiciled CDLs?
2. If so, how many non-domiciled CDLs has it issued every year for the last 10 years?
3. How many regular CDLs has it issued over the same period?

After months of back and forth (and a whole lot of time on hold with different state driver's licensing agencies across the nation), this report presents the responses.

While there's plenty of data to explore and lots to learn from both state-by-state sections and an overall analysis section, this look at real, raw data has uncovered a reality: Truckers were right that

foreign-domiciled CDL drivers with temporary work authorizations are on U.S. roads more than ever before.

Otherwise, the data gets a bit messier. In absolute terms, *Overdrive* uncovered hundreds of thousands of non-domiciled CDLs issued over the last decade, but often reported numbers include reissuances, some learner's permits, Class B/C CDLs and plenty of CDLs that would have expired by now.

For example, over the last 10 years, the state of Texas has issued more than 50,000 non-domiciled CDLs, yet in May the state Department of Public Safety said that only 8,507 of those 50,000 are active and valid today. It gets even trickier when some states only provide data on first-time issuance of non-domiciled CDLs, as opposed to including renewals and re-issues, which make up

the bulk of the data in this report. Considering only active, valid first-time issued non-domiciled CDLs (excluding renewals or re-issues) Texas’ number drops from 8,507 to just 389, according to the state’s Department of Public Safety in early May.

Often, CDLs for people in the U.S. temporarily with work permits have a “limited” term, so they only last for the duration of that person’s work authorization, which could be anywhere from a few months to a few years. Another major confounding issue -- U.S. citizens domiciled in a state other than the one that issues them a CDL may also receive a non-domiciled CDL.

For all these reasons and more, it’s difficult to pinpoint the exact number of non-domiciled CDLs issued or active in the U.S., even with input from states directly.

How many non-domiciled CDLs are active today? Even without gathering definitive numbers from populous states like California, New Jersey, New York and Virginia, *Overdrive* can confirm at the very least 60,000 -- enough to leave a mark. In this report, find a state-by-state breakdown and some analysis of non-domiciled CDL issuance trends in the U.S.

■ DOES Issue NDCDLs, No Data   ■ DOES Issue NDCDLs, Data   ■ DOES NOT Issue NDCDLs

■ ALABAMA

Alabama “doesn't issue a non-domiciled CDL. You have to hold a 10-year permanent resident card,” at the very least, to get a CDL from the Yellowhammer state, said an Alabama Law Enforcement Agency representative.

■ ALASKA

In May, a public information officer at the Alaska Department of Administration, which governs the Alaska DMV, said that the state had only been issuing these licenses for two weeks and has only ever issued 5 non-domiciled CDLs.

As of the most recent data, covering up to **January 15, 2025**, Alaska had a total **15,754 valid Class A licenses issued and 6,296 Class B.**

■ ARIZONA

Arizona issues “limited term” CDLs, the preferred terminology for many states out West, to non-citizens or permanent residents. Arizona issues these CDLs “to people once they provide authorized presence in the country, and proof of Arizona residency,” a representative from the state’s DOT said. The “limited” term generally means that the CDL has been issued for a specific time period, normally for the duration of the applicant’s work authorization.

Arizona DOT couldn’t get a year-by-year breakdown of limited-term CDL issuance, saying that “anytime someone gets a duplicate or a renewal, or any other transaction that reissues the card, the issue date changes,” meaning it’s very “complicated to determine first issuance from reissuances.”

“Additionally,” Arizona’s Motor Vehicle Department “doesn’t generally have a need to answer this type of question for its own purposes, so it isn’t a report or data that we can pull from.”

Instead, the state provided a breakdown of the current number of CDLs, and how many are limited term as of June 6, 2025:

Class A Driver’s License	95,029
Limited Term Class A Driver’s License	6,103
Class A Learner's Permit	2,496
Limited Term Class A Learner's Permit	239
Class B Driver’s License	22,468
Limited Term Class B Driver’s License	793
Class B Learner's Permit	820
Limited Term Class B Learner's Permit	50
Class C Driver’s License	402
Limited Term Class C Driver’s License	15
Class C Learner's Permit	11
Limited Term Class C Learner's permit	0

## ■ ARKANSAS

Arkansas State Police and the state's Department of Finance and Administration did not answer *Overdrive* questions on CDL issuance to non-citizens with temporary U.S. work authorization.

However *Overdrive* found no record of Arkansas accepting temporary work authorizations in the CDL process.

## ■ CALIFORNIA

California doesn't track how many non-domiciled or limited-term CDLs it issues.

FMCSA allows California to issue these "limited" CDLs to "individuals domiciled in a foreign country, other than Mexico and Canada, who have obtained their license from a state which complies with the testing and licensing standards required for CDL drivers," said a rep from the California Department of Motor Vehicles, echoing federal guidance to all states on the issuance of non-domiciled CDLs. They might also be issued to "individuals domiciled in another state while that state is prohibited from issuing CDLs, if the person obtained the license from any state which elected to issue non-domiciled CDLs and which complies with the testing and licensing standards required for CDL drivers."

CDL applicants at California DMVs can submit a wide range of documents, including things like photocopies of cell phone bills, letters from any shelter, nonprofit, employer, faith-based organization, or government within the U.S. attesting that the applicant is a resident of California.

## ■ COLORADO

Colorado said it does not have any "report that separates out CDL holders" based on citizenship and could not answer questions about its non-domiciled CDL count, though it does issue "limited term" CDLs.

## ■ CONNECTICUT

*Overdrive* submitted a Freedom of Information Records Request with the Connecticut DMV on May 27 and has not heard anything back despite following up in July.

## ■ DELAWARE

Delaware provided the following figures in response to a Freedom of Information Act request:

- ▶ Average non-domiciled CDLs/CLPs issued every year: 237 per year
- ▶ Total number of non-domiciled CDLs/CLPs which are still valid: 1,462

## ■ FLORIDA

Something of an outlier among states, Florida was not only able to separate out CDL issuance among U.S. citizens, immigrants who had received their green cards and been granted permanent residence in the U.S., and non-immigrants, which is what Florida called people with temporary work authorizations.

Florida, unlike many states, shows a long history of issuing CDLs to temporary workers, but a definite spike in more recent years after a lull around the pandemic.

Year	US Citizen	Green card holders	Temporary workers	Total CDLs issued	% issued to temporary workers
2015	28,115	6,422	3,702	34,537	13%
2016	27,228	5,680	3,785	32,908	14%
2017	26,428	5,332	3,485	31,760	13%
2018	27,862	6,442	2,557	34,304	9%
2019	28,508	6,971	2,027	35,479	7%
2020	18,712	4,932	1,534	23,644	8%
2021	25,324	7,933	2,104	33,257	8%
2022	33,239	9,033	3,510	42,272	11%
2023	27,361	5,620	5,708	32,981	21%
2024	24,220	5,614	7,867	29,834	32%
2025	8,974	2,161	2,775	11,135	31%

## ■ GEORGIA

Georgia did not find any records “responsive” to *Overdrive*’s request, but did provide a detailed breakdown of overall CDL issuance numbers, showing **more than 234,000 Class A active, valid CDLs in force**.

Georgia’s Department of Driver Services did not directly answer the question in an open records request if the state grants CDLs to non-citizens,

but Georgia does issue CDLs to people who hold I-94 work authorizations and establish residency in Georgia via utility or phone bills, dated within the last six months, showing a name and Georgia address.

If Georgia does issue non-domiciled or “limited term” CDLs, it appears not to track them.

## ■ HAWAII

Hawaii doesn't issue many CDLs of any kind, but Hawaii does issue "limited term" CDLs to non-citizens. Hawaii's Department of Transportation provided the following tables to *Overdrive* illustrating that it has issued just 61 limited-term CDLs that remain active today.

*As of May 23, 2025, the number of valid (unexpired) limited-term CDL and CLP:*

Limited Term CDL	61
Limited Term CLP	5

*As of May 23, 2025, the number of valid (unexpired) limited-term CDL and CLP:*

	CDL new	CDL renew	CLP new	CLP renew
2015	8	6	5	0
2016	6	9	7	2
2017	15	9	16	5
2018	12	33	12	4
2019	11	44	10	2
2020	3	17	2	0
2021	7	3	6	1
2022	7	5	7	1
2023	20	6	16	0
2024	13	12	10	5
2025 (Through May)	3	6	5	0

## ■ IDAHO

Idaho's Transportation Department presented *Overdrive* with the following data on CDL issuance in the state.

Year	CDLs issued	CDLs renewed	Total	Non-domiciled issued	Non-domiciled renewed	Total
2015	8,687	20,516	29,203	32	0	32
2016	9,104	22,757	31,861	94	7	101
2017	9,170	18,293	27,463	173	4	177
2018	11,528	18,023	29,551	162	51	213
2019	11,979	25,141	37,120	109	175	284
2020	10,470	27,168	37,638	108	109	217
2021	12,707	22,043	34,750	171	156	327
2022	13,201	20,065	33,266	163	165	328
2023	11,477	24,458	35,935	319	163	482
2024	11,266	30,050	41,316	565	213	778
2025	6,109	16,782	22,891	413	196	609

## ■ ILLINOIS

Illinois' Secretary of State responded to a Freedom of Information Act request showing the most dramatic spike in non-domiciled CDLs issued, as shown in the table at right.

In 2015, the state issued just 80 non-domiciled CDLs, barely a tenth of a percent of the 68,785 CDLs issued that year. In 2025, 40% of CDLs issued so far are non-domiciled CDLs, according to state data provided. First-time CDL numbers issued by Illinois took a dive in 2020, and haven't fully recovered, yet non-domiciled CDLs have only become more common.

Illinois reported issuing 12,605 non-domiciled CDLs since 2020 (shown in table below), and a total 13,668 since 2015.

	Total CDLs	Non-domiciled CDLs	Percentage non-domiciled
2020	18,402	316	1.72%
2021	25,670	406	1.58%
2022	27,995	616	2.20%
2023	25,116	1,073	4.27%
2024	28,312	5,290	18.68%
2025	12,177	4,904	40.27%

## ■ INDIANA

Indiana's Bureau of Motor Vehicles issued the following data in response to an *Overdrive* Freedom of Information request. Indiana closed out the information request without stating how many regular CDLs the state issued or taking the data back to 2015, as was requested.

Indiana's BMV was, however, able to track how many non-domiciled CDLs went to U.S. citizens domiciled in states other than Indiana and how many went to those who are not citizens of the U.S.

	Non-domiciled CDLs issued	Non-domiciled CDLs issued to non-U.S. citizens	Non-domiciled CDLs issued to U.S. citizens	Percentage of NDCDLs going to non-U.S. citizens
2018	128	103	25	80%
2019	270	223	47	83%
2020	393	336	57	85%
2021	641	548	93	85%
2022	828	780	48	94%
2023	1,178	1,124	54	95%
2024	1,939	1,938	1	99.9%
2025	1,403	1,403	0	100%



## ■ IOWA

Iowa's Department of Transportation in May provided detailed information, breaking down the CDL issuance numbers between non-domiciled and regular, first-time issuances and renewals in both categories.

The trend shows a growing share of non-domiciled CDLs in Iowa but not a huge number, just more than 1,000 in 2024. In 2015, less than 1% of CDLs issued were non-domiciled, but in 2025 that share has grown to nearly 4% of first-time total CDLs.

	Total CDLs (citizen + non)	Total First Time (citizen + non)	Total Renewed (citizen + non)	U.S. citizen unique issued	U.S. citizen first	U.S. citizen renewed	Total Non-domiciled CDLs	First Time non-domiciled CDL issued	Renewed non-domiciled	Non-domiciled % of Total	% of Total first time	Non-domiciled % of Total renewal
2015	39,689	5,810	19,708	39,549	5,769	19,638	140	41	70	0.35%	0.71%	0.36%
2016	49,090	7,778	18,329	48,780	7,682	18,179	310	96	150	0.63%	1.23%	0.82%
2017	55,152	8,162	25,800	54,793	8,065	25,621	359	97	179	0.65%	1.19%	0.69%
2018	79,132	7,521	49,356	78,697	7,437	49,081	435	84	275	0.55%	1.12%	0.56%
2019	60,193	6,396	27,927	59,720	6,308	27,634	473	88	293	0.79%	1.38%	1.05%
2020	46,826	5,048	22,599	46,434	4,975	22,341	392	73	258	0.84%	1.45%	1.14%
2021	48,681	6,021	22,048	48,139	5,916	21,708	542	105	340	1.11%	1.74%	1.54%
2022	54,770	7,422	25,752	54,134	7,302	25,381	636	120	371	1.16%	1.62%	1.44%
2023	51,521	5,378	24,935	50,619	5,137	24,494	902	241	441	1.75%	4.48%	1.77%
2024	49,926	4,816	23,841	48,899	4,586	23,260	1,027	230	581	2.06%	4.78%	2.44%
2025	15,920	1,695	6,960	15,375	1,636	6,560	545	59	400	3.42%	3.48%	5.75%

## ■ KANSAS

Kansas' Department of Revenue, which issues CDLs in the state, did not respond to *Overdrive's* requests for information despite seven emails over a two-month period.

Kansas does issue passenger driver's licenses to non-citizens in the U.S. with work authorization. Kansas requires proof of U.S. citizenship or naturalization for hazmat endorsements on CDLs.

## ■ KENTUCKY

The state of Kentucky asked for \$330 to produce records of its issuance of non-domiciled CDLs.

"Completing the request will require KYTC to pay our IT contractor for three hours of programming work at \$110 per hour," KYTC said.

## ■ LOUISIANA

Louisiana’s Department of Public Safety Chief Counsel said that according to a “preliminary search,” the state’s Office of Motor Vehicles has maintained records on non-domiciled CDL issuance going back to August 2021.

“Since then, Louisiana OMV has issued non-domiciled CDLs” as follows, the chief counsel noted:

▶ 2021: 20 ▶ 2023: 83 ▶ 2025 (thus far): 76  
▶ 2022: 80 ▶ 2024: 172

*Overdrive* followed up with a request for more data around Louisiana’s issuance numbers, but the counsel said they couldn’t differentiate between new and re-issued CDLs and did not respond at all to inquiries about the number of total CDLs issued.

## ■ MARYLAND

Maryland DOT’s Motor Vehicle Administration responded to an *Overdrive* records request by providing the following table.

The numbers show a steady upward trend of a small portion of “limited term” CDLs issued to non-citizens with work authorizations.

## ■ MAINE

In April, Maine reported that out of about 80,000 CDLs of some form or another in circulation, 395 are non-domiciled CDLs.

Maryland renews a limited-term CDL “only if the customer’s temporary lawful status (such as work authorization) is still valid and confirmed” at the time of renewal, a spokesperson for Maryland’s DOT said. “The renewal reflects the updated lawful status and sets the new CDL expiration accordingly. The CDL cannot extend beyond the valid period of their temporary lawful status.”

	CDLs new	CDLs renewal	Limited term new	Limited term renewal
2015	7,692	12,472	90	245
2016	8,273	11,760	75	158
2017	8,955	14,127	142	134
2018	10,183	9,275	191	522
2019	10,084	14,287	236	1,034
2020	5,289	12,779	124	514
2021	8,817	15,982	269	1,612
2022	8,063	10,672	436	1,133
2023	7,754	8,295	502	667
2024	6,833	9,450	552	1,073

## ■ MASSACHUSETTS

Massachusetts' DOT responded to *Overdrive's* public information request in early May with a chart that showed the state issuing dozens of non-domiciled CDLs a year to people transferring their non-domiciled CDLs from out of state, but said it issued a single-digit number of original non-domiciled CDLs each year.

MassDOT provided the following statement: "There are significantly fewer non-domiciled CDLs issued

compared to standard CDLs." Massachusetts DOT specified its regulatory definition of a non-domiciled CDL as: "A CDL issued to: (a) an individual domiciled in a foreign country other than Mexico or Canada, who has complied with the testing and licensing standards required for CDL drivers; or (b) an individual domiciled in another state while that state is prohibited from issuing CDLs, who has complied with the testing and licensing standards required for CDL drivers."

	New regular CDL	Out-of-state conversion for regular CDL	New non-domiciled CDL	Out-of-state conversion for non-domiciled CDL
2019	573	656	1	33
2020	539	636	0	18
2021	298	704	0	27
2022	234	743	0	27
2023	174	873	4	56
2024	85	846	3	80
2025	12	302	0	38

## ■ MICHIGAN

Michigan's Department of State said it does not currently have a report that "will track" instances of non-domiciled CDLs "in a set period."

But the representative did say that as of "April 2025, there are 6,809 Limited Term/Non-Citizen CDL licenses valid in Michigan."

## ■ MISSISSIPPI

Mississippi's Driver Services Bureau and Department of Public Safety said they do not issue non-domiciled CDLs or CDLs at all to people in the U.S. with a temporary work authorizaiton.

## ■ MINNESOTA

Minnesota's Department of Public Safety said it only has data starting in 2018, and that the 2025 data listed below is from Jan. 1 through April 29.

Minnesota's data (below) shows a low but growing number of non-domiciled CDLs issued. In 2018, less than a half of a percent of CDLs went to non-citizens with work authorization. In 2025 so far, that number has climbed to more than 3%.

	Non-domiciled CLP/CDL	Total CLP/CDL	% Non-domiciled
2018	374	76,513	0.49%
2019	425	96,772	0.44%
2020	293	80,770	0.36%
2021	424	88,886	0.48%
2022	517	84,758	0.61%
2023	639	88,499	0.72%
2024	1,436	87,635	1.64%
2025	721	22,598	3.19%

## ■ MISSOURI

As of April 25, 2025, said the Missouri Department of Revenue, the state “had 702 valid non-domiciled CDLs on file.”

Missouri offered total “non-domiciled transactions issued” for each fiscal year going back to FY2022 (July 2021 to June 2022), with the caveat that “some applicants had more than one issuance, since both the permit and CDL may appear in the same fiscal year and often expiration terms are shorter due to immigration status dates.”

- ▶ **FY2022:** 306 (July 1, 2021 to June 30, 2022)
- ▶ **FY2023:** 444 (July 1, 2022 to June 30, 2023)
- ▶ **FY2024:** 961 (July 1, 2023 to June 30, 2024)
- ▶ **FY2025:** 470 legacy (July 1, 2024 to November 8, 2024)
- ▶ **FY2025:** 394 (New System November 11, 2024 to April 24, 2025)

Note that although Missouri said it issued more than 900 non-domiciled CDLs in 2024, it still only reported 702 valid, active non-domiciled CDLs as of April 25.

## ■ MONTANA

Montana’s Department of Justice reported the total active number of CDLs and CLPs, as well as the total active numbers of non-domiciled CDLs in the state.

- ▶ **Total active CDLs:** 48,935
- ▶ **Total active non-domiciled CDLs:** 124
- ▶ **Total active CLPs:** 1,562
- ▶ **Total active non-domiciled CLPs:** 15

## ■ NEBRASKA

Nebraska’s Department of Motor Vehicles gave detailed accounting of its CDL issuance over the last 10 years, and it shows a trend of issuing a small number of non-domiciled CDLs, but a growing portion of the total CDL count.

In 2015, the state issued just 40 new non-domiciled CDLs and renewed 46. In 2024, those numbers were 252 new and 398 renewals.

	CDL total	NDCDL new	NDCDL renew	NDCDL total	NDCLP total	NDCLP new	NDCLP renew
2015	17,651	40	46	86	-	-	-
2016	17,861	48	82	130	-	-	-
2017	18,092	89	91	180	-	-	-
2018	19,595	94	126	220	-	-	-
2019	17,996	139	176	315	-	-	-
2020	17,577	151	210	361	-	-	-
2021	18,715	108	267	375	-	-	-
2022	19,918	161	267	428	174	160	14
2023	19,262	219	305	524	233	214	19
2024	18,452	252	398	650	199	199	0
2025	6,749	86	287	373	81	81	0



## ■ NEVADA

Similarly to some other Western states, Nevada's Department of Motor Vehicles said "data to identify CDL holders for this report cannot be accurately determined since we do not track any person's citizenship status." *Overdrive* asked if the department tracks "limited term" CDLs, but did not hear back.

## ■ NEW HAMPSHIRE

*Overdrive* filed a "right to know" request with New Hampshire's Division of Motor Vehicles and heard back that the state's "Records Management System does not have an existing report that would track" non-domiciled CDL issuance, and that they "would be required to create a new report, which we are not obligated to do so under the Right to Know law, so unfortunately, we will not be able to provide you with those statistics."

New Hampshire will not issue commercial or other driver's licenses to non-U.S. citizens visiting with a tourist visa (B1 or B2) or a fiancée visa (K1 or K2), and requires non-citizens to make in-person appointments for licensing.

Instead, New Hampshire provided the data at the right on CDL issuance of all types, with renewal, replacement and issue numbers dating back to 2017.

Nevada does accept as proof of identity for CDLs valid, unexpired foreign passports with an unexpired U.S. Visa and an I-94 form, or if the I-94 is expired, a Notice of Action (I-797) showing an approved extension.

	Type of transaction	Total CDLs
2017	Renewal	1,396
	Replacement	871
	Issued	367
2018	Renewal	7,241
	Replacement	3,577
	Issued	1,915
2019	Renewal	7,130
	Replacement	4,092
	Issued	1,880
2020	Renewal	4,456
	Replacement	2,928
	Issued	1,734
2021	Renewal	5,188
	Replacement	3,046
	Issued	2,048
2022	Renewal	6,668
	Replacement	3,418
	Issued	2,338
2023	Renewal	6,358
	Replacement	3,272
	Issued	1,837
2024	Renewal	6,338
	Replacement	3,278
	Issued	1,892
2025	Renewal	2,598
	Replacement	1,752
	Issued	847

## ■ NEW JERSEY

Overdrive filed an Open Public Records Act request with the New Jersey Motor Vehicle Commission and heard back that the state would need \$328 to fulfill the request.

## ■ NEW MEXICO

New Mexico's Taxation and Revenue Department noted that during the state's 2022 Legislative Session, HB-144 established the non-domiciled commercial driver's license. The effective date of the legislation was Jan. 1, 2023.

Since then, the program has issued a small but growing number of non-domiciled CDLs up until May 2025, when the provided information was retrieved.

	CDLs Issued	First time (Non-domiciled CDL)	Renewal (Non-domiciled CDL)	First time (Non-domiciled CDL permit)	Renewal (Non-domiciled CDL permit)	Total non- domiciled	% non- domiciled
2015	12,896	-	-	-	-	-	-
2016	20,011	-	-	-	-	-	-
2017	18,548	-	-	-	-	-	-
2018	19,723	-	-	-	-	-	-
2019	19,397	-	-	-	-	-	-
2020	13,478	-	-	-	-	-	-
2021	17,333	-	-	-	-	-	-
2022	17,827	-	-	-	-	-	-
2023	16,825	17	3	26	3	49	0.29%
2024	17,157	105	38	117	6	266	1.55%
2025	7,230	35	23	50	9	117	1.62%

## ■ NEW YORK

Overdrive filed a Freedom of Information Law request with New York State in early May asking how many non-domiciled CDLs it had issued, but the state has not yet responded. Initially the NYS Department of Motor Vehicles said it would take 40 days to

respond. After 56 days, New York responded that it would have to pay a contractor \$60 an hour for eight hours to dig up the response to the FOIL request, plus a \$10 search fee for a total ask of \$495.28.

## ■ NORTH CAROLINA

North Carolina’s DMV initially told *Overdrive* it “has issued zero non-domiciled CDLs because state requirements specify that applicants must be N.C. residents.”

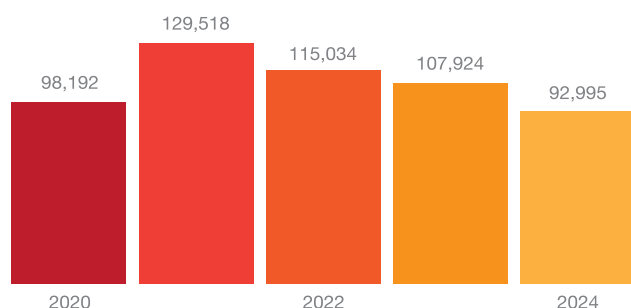
However, North Carolina does issue CDLs to non-citizens in the U.S. with work authorization, and allows them to prove residency with things like utility bills.

*Overdrive* followed up with the state asking how many CDLs it had issued to non-citizens with work authorization and what it calls this type of CDL.

North Carolina’s DMV explained that it has a special restriction for CDLs for non-citizens called “Legal Presence,” which is marked on the front under Restrictions with \*9. “On the back of the card, where restrictions are spelled out, it will say Legal Presence,” the DMV spokesperson said. “Legal Presence encompasses all non-citizens, whether they present an I-94, Green Card, etc. They are all marked with Restriction \*9 on the front and Legal Presence on the back.”

The duration of a Legal Presence CDL in North Carolina “typically lines up with the documentation for legal presence,” the spokesperson continued. North Carolina issues CDLs for five or eight years, so sometimes the Legal Presence CDLs are issued for a shorter period to line up with the duration of a work authorization, and sometimes they’re issued for the full term in cases like school bus driver’s licenses, which only last three years.

North Carolina’s DMV said it did not have a report which tracks the issuance of Legal Presence CDLs, but offered the following chart showing overall CDL issuance.



## ■ NORTH DAKOTA

North Dakota’s Transportation Department began issuing non-domiciled CDLs in July 2013, and since then has issued a small number each year. The chart below shows total CDL issuance, and then the state gave a total count of current active non-domiciled CDLs as well as a yearly average.

	Total CDLs issued
2015	52,565
2016	50,929
2017	49,151
2018	48,533
2019	48,802
2020	47,701
2021	50,092
2022	49,606
2023	49,201
2024	51,321

North Dakota currently has 627 non-domiciled CDLs on record and issues an average of 264 per year, the state reported, adding that “we do not track this number by year.”

## ■ OHIO

Ohio's Department of Public Safety said it identifies what FMCSA names "non-domiciled" CDLs as "Non renewable/non transferrable" CDLs. Ohio's DPS responded to a public information request saying "non-citizen Ohio residents who have legal status can get driver licenses, including CDLs" as the state's legal code "does not allow us to deny licenses to legal residents based on their citizenship. They are required to comply with the same testing and documentation requirements as citizens, including the requirement that skills testing be conducted entirely in English. CDL recipients also must comply with federal requirements for driver training."

The current active, unexpired CDLs issued in Ohio, including those recognized by FMCSA as "non-domiciled" are as follows, broken down by CDL and CDL permit (TIPIC), and by Class of CDL. Ohio could not provide historical issuance over 10 years. All counts shown are as of May 1, 2025, and active, non-expired, not canceled:

- ▶ **Non-domiciled CDL Class A/B/C total:** 5,136
  - Class A: 5,058
  - Class B: 78
- ▶ **Non-domiciled CDL Class A/B/C TIPIC total:** 858
  - Class A: 848
  - Class B: 10
- ▶ **Total active CDLs:** 384,000

## ■ OKLAHOMA

Service Oklahoma said the state has only been issuing non-domiciled CDLs since 2022-'23 and that it has issued 602 total. As of mid-May 2025, the state reported 121,072 active regular CDLs/CLPs and 253 non-domiciled CDLs.

## ■ OREGON

The Oregon Department of Transportation only shared data from July 2020 onward, but reported 11 non-domiciled CDLs issued in 2020, 54 in 2021, 140 in 2022, 445 in 2023 and 382 in 2024, for a total 1,032.

	Non-domiciled CDLs Issued
2020	11
2021	54
2022	140
2023	445
2024	382
Total	1,032

## ■ PENNSYLVANIA

Pennsylvania's Department of Transportation said it did not have historical information readily available, but that out of 389,880 CDL holders in Pennsylvania, 11,572 are non-domiciled.

## ■ RHODE ISLAND

In Rhode Island, all CDL drivers must provide Proof of Status as a U.S. Citizen or Lawful Permanent Resident, as well as proof of Rhode Island residency.

## ■ SOUTH CAROLINA

South Carolina said that as of early March, the total number of lawfully present non-U.S. citizens who have CLPs issued by the state was 102. For CDLs it was 762, just about 0.5% of its total 152,620 commercial licenses in force.



## ■ SOUTH DAKOTA

South Dakota's Department of Public Safety gave the following response: "Non-domiciled CDLs are issued in accordance with South Dakota law 32-12A, Commercial Drivers Licenses and Permits." At right are "the amounts of non-domiciled CDLs from the previous five years. Our system does not distinguish how many are new or renewals."

	Total CDLs	Non-domiciled CDLs	% Non-domiciled
2020	5,830	53	0.91%
2021	11,906	94	0.79%
2022	13,000	95	0.73%
2023	12,384	108	0.87%
2024	13,510	169	1.25%

## ■ TENNESSEE

Tennessee requires Proof of U.S. Citizenship or Lawful Permanent Resident status for all CDL applicants. The state does not accept I-94 work authorizations from non-citizens.

## ■ TEXAS

Texas' Department of Public Safety, after initially reporting numbers that were wrong due to "human error," DPS said, provided an update showing off-trend data -- that Texas issued more non-domiciled CDLs ten years ago than it did in 2025.

Texas DPS said "it is important to clarify that the numbers you received in the table include all commercial driver license (CDL) transactions for each year -- these include renewals, modifications (like a change of address or name), duplications (replacements for lost or stolen cards) and original issuances (first-time applicants)" and that Texas CDLs are valid for eight years.

The rep noted that "as of May 5, 2025, there are 389 active, original issuance non-domiciled CDLs in Texas -- these are cards held by first-time non-domiciled CDL applicants that have not yet expired nor have they been replaced, modified or duplicated."

When factoring in re-issues, Texas DPS continued, "the total number of all active non-domiciled CDLs -- which would include those that have been renewed, modified or replaced -- that number is 8,507 as of May 5."

	Non-domiciled CDL issuances	Total CDL issuances	Rate
2015	7,654	466,806	1.6%
2016	6,536	468,993	1.4%
2017	4,302	398,536	1.1%
2018	5,964	395,046	1.5%
2019	5,938	358,909	1.7%
2020	3,522	202,327	1.7%
2021	4,596	303,365	1.5%
2022	3,311	233,369	1.4%
2023	3,905	213,838	1.8%
2024	6,265	220,430	2.8%
Total	51,993	3,261,619	1.6%

## ■ UTAH

Utah's Department of Public Safety provided the following:

- ▶ **Limited CDL (non-domiciled):** 1,355 original CDLs issued since 2015
- ▶ **Regular CDL:** 50,986 original CDLs issued since 2015

## ■ VERMONT

Vermont's Agency of Transportation said a "CDL credential could be issued to a non-U.S. citizen with a valid employment authorization document or a valid unexpired passport accompanied by the most current Form I-94."

There have been 57 (25 new, 32 renewed) non-domiciled CDLs issuances since 2019, including (not shown) 2 at the time of *Overdrive's* query in 2025:

	Total CDLs	Non-domiciled CDLs	% Non-domiciled
2019	9,003	5	0.06%
2020	5,417	9	0.17%
2021	5,949	6	0.1%
2022	6,726	7	0.1%
2023	8,016	16	0.2%
2024	5,806	12	0.21%

Vermont noted that for both non-domiciled and CDL credentials, they're only valid for either two years or four years, so the total number issued is not the number that are currently active.

## ■ VIRGINIA

*Overdrive* filed a Freedom of Information Act request with the Virginia Department of Motor Vehicles and got back the response that looking up the CDL counts would cost between \$500 and \$999.

## ■ WASHINGTON

Washington's Department of Licensing provided data going back to 2018, when it first implemented non-domiciled CDLs, for first-issue licenses. Since implementing non-domiciled CDLs in the state in 2018, Washington reported issuing 5,481 non-domiciled CDLs. Shares of the total first-time-issued CDLs have risen from 4% before 2020 to 16% in 2024.

	Total CDLs	Non-domiciled CDLs	% Non-domiciled
2018	10,493	375	4%
2019	10,640	394	4%
2020	7,494	321	4%
2021	10,383	539	5%
2022	11,772	687	6%
2023	11,208	1,342	12%
2024	11,219	1,823	16%

## ■ WEST VIRGINIA

West Virginia requires foreign-born CDL applicants present valid, unexpired Permanent Resident documentation, a Certificate of Naturalization, or other proof of U.S. citizenship. West Virginia does not issue CDLs to non-citizens with a work authorization.

## ■ WISCONSIN

Wisconsin's Department of Motor Vehicles did not have reporting by year for non-domiciled CDL numbers. "The first number below is the total number of cards issued since July 1, 2016, and the second number reflects the number of customers holding an unexpired CDL marked 'non-domiciled' as of November 22, 2024," Wisconsin's DMV said.

- ▶ **Total count of non-domiciled CDLs issued:** 6,115
- ▶ **Counts of unexpired CDLs marked non-domiciled:** 1,204

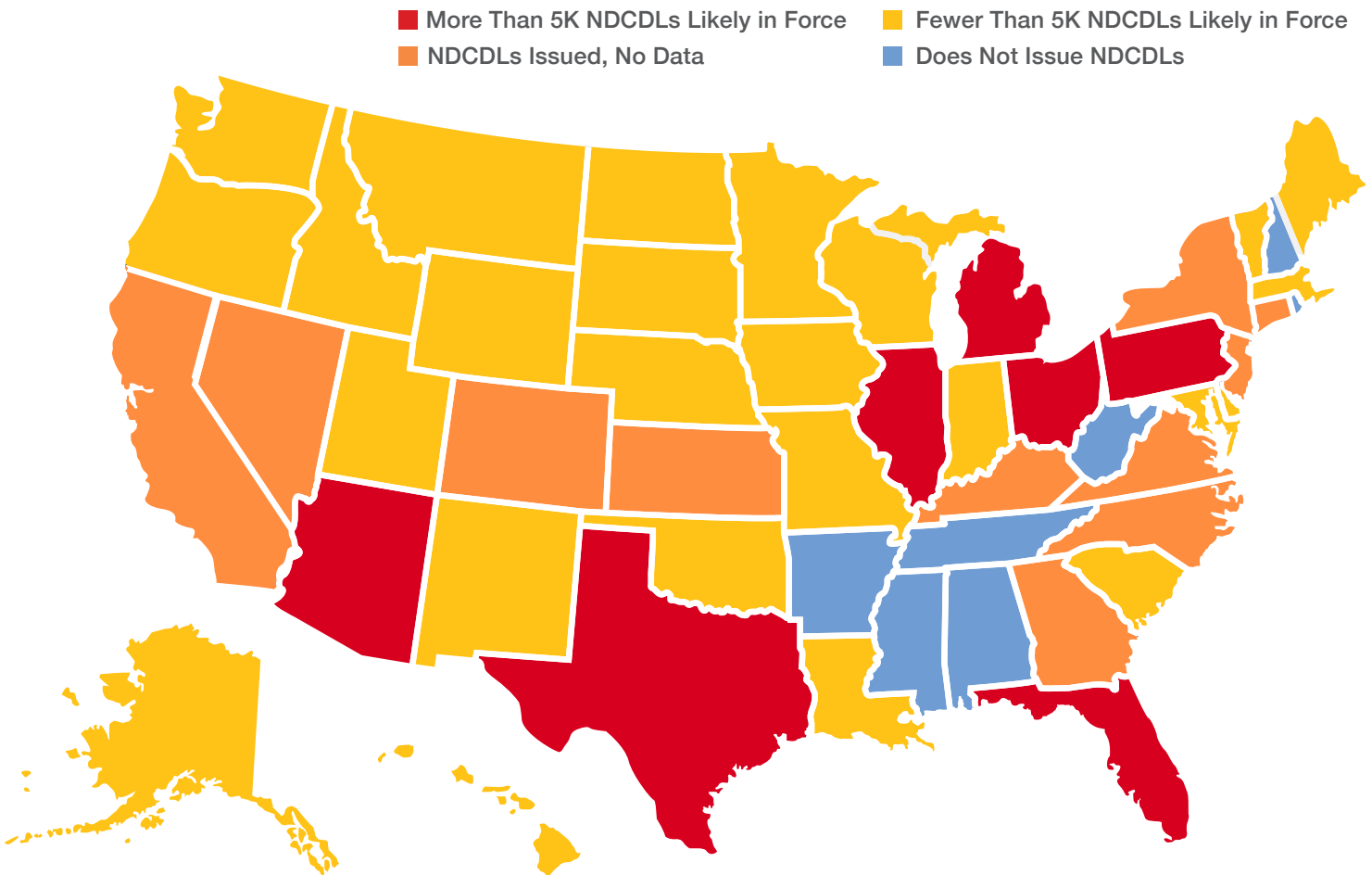
The provided numbers include Valid, Suspended, Revoked, and Disqualified licenses but exclude card statuses of Surrendered, Canceled, Moved Out of State (MOS), and Deceased, Wisconsin noted, "consistent with how DMV typically reports cardholder data in our annual Facts & Figures reporting."

## ■ WYOMING

Wyoming's Department of Transportation responded that as of "April 30, 2025, there were **28,259 Commercial Driver's License holders in Wyoming. Of these, 61 are classified as non-domiciled CDL holders.**"

The WYDOT rep added that "these individuals typically work within the state's ranching and farming industries" and "for clarification, in Wyoming, 'non-domiciled CDL holders' refers specifically to temporary residents. It's important to remember that these individuals are still required to provide all necessary Real ID documentation, including proof of Wyoming residency, proof of legal presence, and proof of their ability to work."

## Analysis



Despite some big states providing no data and each state reporting numbers in a unique way, there do appear to be some big players in non-domiciled CDL issuance.

- ▶ **Pennsylvania:** 11,572 active NDCDLs
- ▶ **Illinois:** 11,000+ NDCDLs issued in the last 18 months
- ▶ **Florida:** 10,000+ NDCDLs issued in the last 18 months
- ▶ **Texas:** 8,507 active NDCDLs
- ▶ **Michigan:** 6,809 active
- ▶ **Arizona:** 6,103 active
- ▶ **Ohio:** 5,136 active

The states that provided data and issue the greatest share of NDCDLs are as follows.

- ▶ **Illinois:** 40% as of April 2025
- ▶ **Florida:** 32% in 2024
- ▶ **Washington:** 16% in 2024

Otherwise, states almost always issue less than 5% of their CDLs as non-domiciled or limited term. For most states and most years reported, the numbers were small in absolute terms and as a percentage, usually under 1%.

Yet non-domiciled CDL issuance has increased quickly among the majority of states that provided data. Louisiana, for example, issued just 20 non-domiciled CDLs in 2021. In 2024, the state issued 172. Iowa issuance has crept up from just 0.35% of CDLs issued being marked as non-domiciled to more than 2% in 2024. Between 2022 and 2024, in particular, the numbers jump in a lot of states, like in Missouri, where non-domiciled CDL issuance rose from 306 to 961.

*Overdrive* thanks state CDL-issuing agencies who participated in this report, likewise readers, the truckers who move America. While the numbers here are preliminary, they point to what so many told *Overdrive* in previous surveys and reporting: Non-domiciled CDL issuance represents a growing trend for which no one has yet fully accounted.





# OVERDRIVE

[www.overdriveonline.com/contact-us](http://www.overdriveonline.com/contact-us)