CDL Medical Certification Integration

COMPLIANCE BRIEF

WHAT IS HAPPENING BY JUNE 23, 2025?



- The Federal Motor Carrier Safety Administration (FMCSA) and state driver's licensing authorities (SDLAs) are making the medical certification process easier for commercial driver's license (CDL) and permit (CLP) holders.
- SDLAs will get automatic updates from the National Registry of Certified Medical Examiners (NRCME) after each CDL driver's medical exam.
- Medical certification standards are not changing. The process only affects CDL/CLP medical certification recordkeeping.

WHAT NEEDS TO BE DONE JUNE 23, 2025, AND AFTER:

- Each SDLA must switch to the direct update process. They will post medical certification information to a CDL/CLP driver's motor vehicle record (MVR) automatically, without drivers needing to be involved.
- CDL and CLP holders won't need to submit new medical certificates to their SDLA.
- FMCSA does not require medical certificates to be given to CDL/CLP drivers, but drivers should ask for one at each exam because there might be a 2-4 day delay before the certification shows up on the MVR.
- CDL drivers must keep self-certifying their driving type, like interstate or intrastate, excepted (no medical exam required) or non-excepted (must be medically certified).
- Carriers don't need to check if a CDL driver's medical examiner is on the NRCME, but they still need to run an MVR and put it in the driver's qualification (DQ) file after each medical exam.
- Non-CDL driver medical certifications are not affected.
 Non-CDL drivers will still get a medical certificate, which they need to give to their carrier.





ACRONYMKEY:

FMCSA – Federal Motor Carrier Safety Administration

SDLAs - state driver's licensing authorities

CDL – commercial driver's license

CLP - commercial learner's permit

 ${\sf NRCME-National\,Registry\,of\,Certified\,Medical\,Examiners}$

MVR - motor vehicle record

DQ - driver qualification

NRII - Medical Examiner's Certification Integration

CME - certified medical examiner

CDLIS - CDL Information System

CMV - commercial motor vehicles



SEVEN FREQUENTLY ASKED QUESTIONS WITH MORE DETAILS



WHAT SHOULD CDL/CLP DRIVERS AND EMPLOYERS DO TO GET READY FOR THESE CHANGES?

- Monitor the SDLA: Drivers and employers should check their SDLA's transition date and procedures. All SDLAs must switch to the new system by June 22nd. The FMCSA webpage at the following link shows states that have transitioned so far: National Registry.
- Follow the current process until transition: CDL/CLP drivers must keep submitting copies of each medical certificate until their SDLA tells them to stop.
- **Prepare for the transition:** Update internal processes and train staff on the new procedures. If more than one licensing state is involved, there may be more than one process to update DQ files until all SDLAs transition.
- **Inform non-CDL drivers:** If applicable, let non-CDL drivers know that their medical certification process is not changing.

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WHAT SHOULD BE DONE AFTER THE TRANSITION DATE OR NO LATER THAN JUNE 23, 2025?

- Carriers: Must place MVRs in the driver qualification (DQ) file within the required timeframe (to be determined). They no longer need to note that the certified medical examiner (CME) was on the Registry.
- CDL/CLP drivers: Must continue to self-certify their driving tier (interstate or intrastate) and whether they need to be medically certified (Excepted/Non-excepted) when they apply for a new, renewed, or upgraded CDL/CLP.
- Carriers and/or drivers: Schedule exams well before the expiration date. Enforcement must go by what is in the CDL Information System (CDLIS). If a CDL driver does not have the medical card that was just issued, the system may show their certification as expired if there is any delay in transmission and the old expiration date has passed.



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WILL CLINICS AUTOMATICALLY ISSUE MEDICAL CARDS TO CDL/CLP DRIVERS? WHAT IF THEY DON'T?



On and after June 23,2025, examiners don't have to issue CDL/CLP drivers medical cards unless they ask for one. It is not known if every clinic will issue medical certificates. To avoid roadside inspection concerns, CDL/CLP drivers should be directed to ask for and receive a medical card to carry until the new medical certification information is on their MVR. A medical certificate copy should be given to the carrier to show they have passed their medical exam.

There is a potential 2 to 4-day gap for the new information to show on the MVR. Examiners must enter the exam results in the registry by

midnight of the day after the exam and data transfer from the registry to the SDLA takes about two days. If enforcement does not see a current medical certification in CDLIS and the driver can't prove they are medically certified, they can be placed out-of-service.





HOW LONG WILL CARRIERS HAVE TO PLACE AN UPDATED MVR IN THE DQ FILE?

Currently, carriers have 15 days after each exam to place a CDL MVR in the DQ file. FMCSA has not changed that regulation yet.

After June 23rd, this time will be shorter, but we don't know how much shorter. States currently have 10 days to manually enter and update their system.

No later than June 23, 2025, the MVR should reflect the new information in 2-4 days after the exam.



WHY ARE PROCEDURES CHANGING?

FMCSA published a rulemaking in 2015 that requires SDLAs to connect to NRCME. This connection simplifies the process and accounts for every medical examination, including those where the CME medically disqualifies the driver. The original deadline was June 22, 2018, but it was pushed back to 2021 and again to 2025 to help accommodate technology development to transmit and receive information from the NRCME to the SDLAs.



DOES THIS RULE IMPACT NON-CDL DRIVERS?

No. SDLAs don't track the medical status of regular driver's licenses or even non-CDL commercial motor vehicles (CMV) classes (e.g., chauffeur). As a result, the current process will not change for those who hold these licenses. However, if a driver has a CDL or CLP that they want to maintain independent of their current position, the information will be transmitted by FMCSA to the SDLA.

A non-CDL driver will continue to receive a copy of the medical examiner's certificate, and the motor carrier must retain a copy in the driver's qualification file. The motor carrier must verify that the CME is on the NRCME and create a note that the exam was performed by a certified examiner.



HAVE MEDICAL CERTIFICATION REQUIREMENTS CHANGED?

The medical examination process, the standards in 391.41, and the Medical Advisory Criteria in Part 391 Appendix A, remain the same.



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Mark Schedler joined J. J. Keller & Associates, Inc., after spending 25 years in leadership in the transportation industry. As one of our Senior Editor experts, Mark's main passion is helping our customers navigate risk.

Mark's extensive industry experience provides him with a unique perspective. He understands the challenges faced by individuals in various job roles within a typical carrier. He is dedicated to equipping customers with the necessary tools to excel in their jobs.

Since joining the company in 2016, Mark has been committed to providing prompt, accurate, and honest answers to customer questions. His areas of expertise primarily revolve around transportation operations and safety, driver qualification, and passenger-carrier rules. Mark is also a frequent speaker at events and his articles have been featured in several trade publications.



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On and after June 23,2025, medical examiners must continue to issue a **Medical Examiner's Certificate** to non-CDL CMV drivers and any CDL driver who asks for it as alternative proof while they wait for their exam to show up on their MVR.

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