

CDL Medical Certification Integration

COMPLIANCE BRIEF

WHAT CHANGED ON JUNE 23, 2025?

- The Federal Motor Carrier Safety Administration (FMCSA) and state driver's licensing authorities (SDLAs) made the medical certification process easier for commercial driver's license (CDL) and permit (CLP) holders.
- SDLAs now get automatic updates from the National Registry of Certified Medical Examiners (NRCME) after each CDL driver's medical exam. This initiative is also called NRII.
- Medical certification standards have not changed. The process only affects CDL/CLP medical certification recordkeeping.

For more resources, visit the NRII Learning Center webpage at <https://nationalregistry.fmcsa.dot.gov/nriilearning-center>

WHAT PROCESS CHANGES APPLY IN STATES THAT HAVE TRANSITIONED TO NRII?

FMCSA EXEMPTION: Effective April 11, 2026, through October 11, 2026, the Federal Motor Carrier Safety Administration (FMCSA) has replaced the previous waiver to allow a paper copy of the medical examiner's certificate to serve as proof of certification for up to 60 days after issue. The prior waiver also allowed 60 days and was effective through April 10, 2026. FMCSA expects no further medical card waivers or exemptions.

- Carriers can use a copy of the medical card in the DQ file to be replaced by the CDL motor vehicle record (MVR) within 60 days of the DOT exam.
- **NOTE:** For CDL/CLP drivers licensed by states that have not transitioned to NRII, medical cards must be issued and can also be carried by CDL/CLP drivers for 60 days after each exam with a copy in the DQ file to be replaced by the updated MVR. The states that have not transitioned to NRII are listed at the bottom of the NRII Learning Center webpage (link provided above). Drivers licensed in non-NRII states must submit their medical cards after each exam to their SDLA until that state transitions to NRII, and carriers must still document verifications that the examiner was on the National Registry.
- To share with drivers before their medical exam, if needed, download a copy of the exemption from FMCSA's website at <https://nationalregistry.fmcsa.dot.gov/assets/documents/nriilearningcenter/NRII%20Waiver%20Oct%2011%202026.pdf>
- Each SDLA must switch to the direct update process, if they have not done so already. They will post medical certification information to a CDL/CLP driver's MVR automatically, without drivers needing to be involved.
- CDL and CLP holders don't need to submit new medical certificates to their SDLA.
- FMCSA does not require, but recommends, medical certificates to be given to CDL/CLP drivers. However, 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 a MVR and put it in the driver's qualification (DQ) file after each medical exam. Carriers should replace any medical certificate issued during the waiver period within 60 days.
- 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.

SIX FREQUENTLY ASKED QUESTIONS WITH MORE DETAILS

1

WHAT SHOULD BE DONE FOR DRIVERS LICENSED BY STATES THAT HAVE TRANSITIONED TO NRII?

- **Carriers:** Must place MVRs in the driver qualification (DQ) file as soon as possible after the DOT exam. They no longer need to note that the certified medical examiner (CME) was on the Registry. The exemption allows a copy of the medical card in the DQ file for 60 days after the exam.
- **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. The exemption allows drivers to carry their paper medical card for 60 days after each exam to avoid issues due to data transfer delays.

2

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

Now that June 23, 2025, has passed, examiners no longer have to issue CDL/CLP drivers medical cards, but should issue medical cards per the FMCSA exemption to minimize issues for drivers. If an examiner does not want to issue a medical card, a copy of the waiver should be provided to the driver for the examiner to review. 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. Delays are even longer if transfer validation issues occur. 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. CDL drivers should recertify well before the current expiration date to avoid their MVR showing them as "not certified." The latest exemption will help by allowing the paper medical card as proof for 60 days after the exam.



3

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

Before June 23, 2025, carriers had 15 days after each exam to place a CDL MVR in the DQ file.

On and after June 23, 2025, FMCSA has not specified a timeframe for placing the MVR in the DQ file. However, until October 11, 2026, the waiver allows carriers to use a copy of the medical card for 60 days to be replaced by the MVR.



4

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 change was also to reduce falsification of medical certifications. 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.

5

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.

6

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.



RICK SMITH

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Rick joined J. J. Keller in 2024, bringing nearly two decades of hands-on experience in the transportation industry. His background includes managing transportation programs for several large private motor carriers, giving him a deep understanding of operational and regulatory challenges.

As a Senior Compliance Expert, Rick helps clients navigate an ever-changing transportation regulatory landscape by addressing a wide range of compliance questions and challenges. He specializes in breaking down complex regulations into clear, practical guidance that organizations can easily apply.

Rick's expertise also extends to environmental health and safety (EHS) management, providing him with a comprehensive perspective on risk reduction and regulatory oversight. This unique combination of experience allows him to deliver well-rounded solutions that support both safety and compliance.

Before joining J. J. Keller, Rick worked closely with the company as a client, gaining firsthand insight into the significant value J. J. Keller brings to its customers—a perspective that now informs his commitment to helping others succeed.

Stock up on Medical Exam Forms!

Turn to J. J. Keller for **Medical Examination Reports** and **Medical Examiner's Certificates**! Our **Medical Examination Report** helps you comply with 49 CFR §391.43.

Medical examiners must 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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