



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

December 5, 2025

The Honorable Derek D. Barrs
Administrator
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue, SE
6th Floor, West Building
Washington, DC 20590-9898

RE: Medical Examiner's Certification Integration Implementation Challenges

Dear Administrator Barrs,

On behalf of the members of the Commercial Vehicle Safety Alliance (CVSA), I am writing to request that the Federal Motor Carrier Safety Administration (FMCSA) provide guidance to commercial motor vehicle enforcement officials that a paper copy of a valid Medical Examiner's Certificate is permitted to demonstrate compliance with the applicable requirements during a roadside inspection and motor carrier safety audits and investigations until all issues associated with integrating the state driver's license administrations' systems with the medical examiners' systems are resolved and all states have fully complied with the requirements of FMCSA's 2015 Medical Examiner's Certification Integration final rule (commonly refer to as NR11).

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle safety officials and industry representatives. The Alliance aims to prevent commercial motor vehicle crashes, injuries and fatalities and believes that collaboration between government and industry improves road safety and saves lives. Our mission is to improve commercial motor vehicle safety and enforcement by providing guidance, education and advocacy for enforcement and industry across North America.

Justification

As noted on FMCSA's National Registry of Certified Medical Examiners Learning Center website, the purpose of NR11 is to require the electronic communication of CDL drivers' medical examination results from the certified medical examiners to the state driver's licensing agencies (SDLA) to be posted on the Commercial Driver's License Information System (CDLIS) driver motor vehicle record. The rule is intended to reduce the burden of having to maintain paper records for both the driver and motor carrier, while also providing enforcement officials with the most up-to-date medical certification status for a commercial motor vehicle driver.

Unfortunately, however, since the final rule was effective in 2018, the motor carrier community and enforcement officials have identified a number of challenges with implementation of the electronic communications

requirements in NRII. As of the date of this letter, according to FMCSA's NRII Learning Center website, nine states have not yet implemented the NRII requirements. As a result, drivers in those states must continue to carry a paper copy of their Medical Examiners Certificate as proof of their medical certification. In addition, earlier this year, FMCSA was made aware of issues some jurisdictions were experiencing with reliable transmission of driver medical certification information, even in states that have fully implemented the NRII requirements, due to incompatibility and errors being made in the data exchange between the medical examiners, FMCSA's National Registry of Certified Medical Examiners and the SDLAs. This prompted the agency to publish a temporary waiver, allowing drivers and motor carriers to continue to carry and present a paper copy of the driver's medical certificate up to 15 days after the date of issuance. FMCSA later amended that waiver to allow drivers and motor carriers to continue to utilize a paper copy of the driver's medical certificate up to 60 days after the date of issuance.

Motor carriers continue to grapple with the effects of this partial implementation of the NRII requirements. Currently, if a motor carrier has a driver whose medical certificate is not transmitting in the system correctly, they are forced to either temporarily cease using that driver until the issue is resolved or resubmit them for an additional medical certification exam, to ensure that they can prove the driver is qualified. And, because there is currently no notification requirement to confirm when a driver's Medical Examiners Certificate is properly associated with the driver's motor vehicle record, motor carriers are also forced to query drivers' Motor Vehicle Record (MVR) more frequently to monitor when the driver's Medical Examiners Certificate is posted to CDLIS. In addition, in order to ensure their drivers remain compliant, motor carriers are forced to monitor NRII implementation from state to state. This adds additional costs and administrative burden to motor carriers, delays recruitment and onboarding of new drivers, and impacts existing drivers' ability to complete deliveries, despite being properly qualified.

To address these challenges and provide the motor carrier and enforcement communities with stability, CVSA requests that FMCSA provide guidance to commercial motor vehicle enforcement officials that drivers are permitted to carry paper copies of their valid Medical Examiner's Certificate with them to demonstrate compliance with the applicable requirements until all issues associated with integrating the state driver's license administrations' systems with the medical examiners' systems are resolved.

CVSA works to closely monitor, evaluate and identify potentially unsafe transportation processes and procedures as well as to help facilitate and implement best practices for enhancing safety on our highways. Commercial motor vehicle safety continues to be a challenge and we need the involvement of all affected parties to help us better understand these issues and put into place practical solutions. We appreciate the agency's commitment to safety and stakeholder involvement. If you have questions or comments, please do not hesitate to contact me at 202-998-1008 or collin.mooney@cvsa.org.

Respectfully,



Collin B. Mooney, MPA, CAE
Executive Director
Commercial Vehicle Safety Alliance