



Commercial Vehicle Safety Alliance

Improving commercial motor vehicle safety and enforcement

March 9, 2026

Dockets Operations
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building, Ground Floor
Washington, DC 20590-0001

RE: Docket Number: FMCSA-2026-0265

Qualification of Drivers; Commercial Vehicle Safety Alliance; Application for Exemption

The Commercial Vehicle Safety Alliance (CVSA) respectfully submits the following comments in response to the Federal Motor Carrier Safety Administration's (FMCSA) request for feedback on CVSA's request that the agency allow motor carriers and drivers to rely on a paper copy of the medical examiner's certificate (MEC) as proof of the driver's medical certification until the Medical Examiner's Certification Integration (NRII) final rule is fully implemented, docket number FMCSA-2026-0265.

CVSA is a nonprofit organization comprised of local, state, provincial, territorial and federal commercial motor vehicle (CMV) 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.

In December 2025, CVSA sent a letter to FMCSA asking the agency to consider providing 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 NRII). The letter highlighted a number of challenges associated with implementation of the requirements of NRII.

As of the date of the letter, nine states had 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, the letter notes that in 2025 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 and then extend a temporary waiver, allowing drivers and motor carriers to continue to carry and present a paper copy of the driver's medical certificate.

These delays in implementation create challenges for the motor carrier community. 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 the Commercial Driver's License Information System (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.

Since the letter was sent, however, progress has been made in implementing the NRII requirements. As of March 2, 2026, all but five states have implemented the NRII requirements and it appears many of the data exchange issues have been resolved. Whether a full-year exemption is necessary depends largely on the impact to the motor carrier community operating in the remaining five states and the expected timeline to bring those states online. The current waiver allowing the use of paper forms is effective through April 10. It is possible that another short-term waiver may be sufficient to provide industry with the necessary relief. However, if FMCSA determines that, based on stakeholder feedback, the scope of the problem justifies issuance of an exemption, CVSA encourages FMCSA to continue monitoring implementation of NRII and to rescind the exemption when all states have become compliant.

The Alliance 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.

If you have further questions or comments, please do not hesitate to contact me at 202-998-1008 or collin.mooney@cvsa.org.

Respectfully,



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