



Inspection Bulletin

North American Standard Inspection Program

2015-04 – Enforcement of Medical Examiner's Certificate Integration with the Commercial Driver's License

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Summary

This inspection bulletin is for enforcement personnel who stop drivers with a commercial driver license (CDL) or a commercial learner permit (CLP) for a driver/vehicle examination (roadside inspection). This bulletin applies to CDL and/or CLP holders only.

Background

On Dec. 1, 2008, the Federal Motor Carrier Safety Administration (FMCSA) published a final rule adopting regulations to implement section 215 of the Motor Carrier Safety Improvement Act of 1999 (MCSIA). Effective June 23, 2025, medical examiners are required to submit the CDL holder's medical examination results to the state driver's licensing agency (SDLA) on behalf of the CDL holder indicating that they meet the physical qualification requirements of part 391. The driver no longer needs to carry the medical examiner's certificate on their person.

Roadside Issues

The final rule effective Jan. 30, 2015, for CDL and CLP drivers no longer requires the physical possession of one's medical certificate. Without enforcement guidance on this rule, drivers could be declared out of service (OOS) when:

- A CDL/CLP driver operating a passenger-carrying or property-carrying vehicle is not in possession of a valid medical certificate.

Guidance

After Jan. 30, 2015, if during a roadside inspection, a check of the CDL driver's information via Commercial Driver's License Information System (CDLIS) or National Law Enforcement Telecommunications System (NLETS) indicates that the driver is medically qualified, this shall constitute possession of a valid medical certificate and compliance with 391.41(a)(1). This applies to the operation of all commercial motor vehicles (CDL and non-CDL alike) being driven by a CDL holder. Effective June 23, 2025, a medical examiner must submit the current medical examiner's certification to the SDLA to confirm the CDL holder is medically qualified. In the event of a conflict between the medical certification provided electronically by FMCSA and a paper copy of the medical examiner's certificate, the medical certification information provided electronically by FMCSA shall control (391.41(a)(2)(iv)).



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While there are numerous combinations of the CDL medical requirement scenarios, personnel shall base their enforcement on the CDLIS or Nlets response(s). A basic guide for the proper identification and documentation of medical certificate violations is as follows:

CDL Driver

- *CDL is valid, medical indicator shows medical information on file. No violation.
- CDL is valid, medical indicators show no medical information on file, no medical certificate in driver’s possession. Cite 391.41(a)(1) and declare the driver OOS.
- CDL is valid, medical indicator shows no medical information on file, current medical certificate in driver’s possession. Cite 391.41(a)(1). Do not declare the driver OOS.
- CDL is not valid (e.g. cancelled, downgraded, disqualified, revoked, suspended, etc.) and the driver cannot provide proof of a current medical exam. Cite 391.41(a)(1) and declare the driver OOS. Cite the most appropriate code for the CDL violation identified.

Non-CDL Vehicle

- The driver of the non-CDL vehicle must have either the medical certificate in their possession or if they hold a CDL, the medical information must be contained on their state driver’s license file or be in possession of their medical certificate.

NOTE: FMCSA occasionally issues waivers while SDLAs are becoming compliant with these requirements. Verify there are no active waivers before taking enforcement action. Waivers can be found at www.cvsa.org/inspections/exemptions.

*It’s also important for enforcement personnel to be aware that CDL checks run through Nlets may not show medical information. If the CDL is valid, you must assume the medical information is on file with the SDLA.

