

# DOT PHYSICAL CHANGES

## WHAT YOU NEED TO KNOW

*Within a month, commercial driver's license (CDL) and commercial learner's permit (CLP) holders won't have to submit each medical certificate to their state driver licensing agency (SDLA). By June 23, 2025, all SDLAs will get automatic updates from the National Registry of Certified Medical Examiners (NRCME).*

### 1. 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 on or before June 22nd.
- **Follow the current process until transition:** CDL/CLP drivers must keep submitting copies of each medical certificate until their SDLA tells them to stop. South Carolina will not be accepting after June 22nd
- **Prepare for the transition:** Update internal processes and train staff in the new procedures. If more than one licensing state is involved, there may be more than one process to update driver qualification (DQ) files until all SDLAs transition.

### 2. What should be done after the transition date or by June 23, 2025?

- **Carriers:** Must place motor vehicle records (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.

### 3. 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.***

There is a potential 2 to 4-day gap for the information to show on the MVR.

- Examiners must enter the exam results by midnight of the day after the exam.
- The data transfer from the registry to the SDLA takes about two days.

Given the potential gap in proof of medical certification, two best practices to consider:

- To minimize roadside inspection concerns, carriers should direct CDL/CLP drivers to ask for a medical card to carry until the new medical certification information is on their MVR.
- The driver should give a medical certificate copy to the carrier to show they have passed the exam.

### 4. 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. On and after June 23rd, this time may be shorter if FMCSA changes the rule. By June 23, 2025, the MVR should reflect the current information in 2-4 days after the exam.

### 5. Why are procedures changing?

- FMCSA published a rulemaking in 2015 that requires SDLAs to connect to NRCME, but the initiative was delayed more than once. The connection simplifies the CDL medical certification documentation process and accounts for every medical examination, even disqualifications.

### 6. Does this rule impact non-CDL drivers?

- No. Drivers who hold non-CDL licenses will still receive a medical certificate which should not be submitted to their SDLA.

*Key to remember: Carriers and drivers must understand their responsibilities in this critical transition to avoid CDL driver medical qualification issues.*