

DQ360™ Executive Field Guide No. 7

Medical Certification: More Than Keeping a Card in the File

Executive Brief for Fleet Owners and Transportation Leaders

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Medical Certification: More Than Keeping a Card in the File

Companion to DQ360™ Article No. 7

Written by Brad Redden, Founder and Chief Compliance Advisor, CPO Consulting™ | Ask the Chief™

Executive Brief

Medical qualification should not be managed simply by tracking the expiration date on a Medical Examiner's Certificate.

Changes to the federal medical certification process have increasingly connected certified medical examiners, FMCSA's National Registry of Certified Medical Examiners, State Driver Licensing Agencies, CDLIS records, drivers, and motor carriers. At the same time, the fundamental responsibility remains unchanged: a motor carrier should have confidence that a driver is medically qualified for the CMV operation they are assigned to perform.

Effective oversight requires understanding the driver's current medical qualification status, not simply confirming that a document exists.

Executive Takeaways

- Medical qualification is an ongoing status, not simply a document-retention requirement.
 - CDL self-certification should be consistent with the commercial operation the driver actually performs.
 - Electronic transmission of medical certification information does not eliminate the need for verification.
 - A current medical certificate should not cause management to ignore a subsequent physical or mental health change that may affect continued qualification or safe CMV operation.
 - Medical variances, exemptions, restrictions, and expiration dates require additional attention.
 - Temporary regulatory procedures and implementation issues should be monitored so temporary practices do not become outdated permanent procedures.
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Questions Every Executive Should Ask

- Do we know how medical qualification is verified before a driver is dispatched?
 - Are our CDL drivers properly self-certified for the operations they perform?
 - Do we verify medical qualification through the appropriate licensing records rather than relying exclusively on a paper medical certificate?
 - Who investigates discrepancies between the driver's medical certification and state licensing record?
 - Do drivers and supervisors understand what to do when a driver's physical or mental health changes?
 - How far in advance do we begin monitoring upcoming medical certification expirations?
 - Are medical variances, exemptions, or restrictions identified and appropriately managed?
 - Do our procedures reflect current FMCSA requirements rather than an outdated medical-card process?
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Warning Signs That Deserve Management Attention

- Medical qualification is managed solely by photocopying medical certificates.
 - Drivers routinely wait until immediately before expiration to complete DOT physical examinations.
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- No one verifies whether medical information has been properly reflected in applicable licensing records.
- Driver self-certification status is rarely or never reviewed.
- Supervisors do not know what to do when they become aware of a significant change in a driver's health.
- Variances, restrictions, or exemptions are poorly documented or understood.
- Temporary regulatory procedures are incorporated into company practice without a scheduled date for reevaluation.

The Chief's Recommendation

Stop managing medical qualification as an expiration-date exercise.

Establish a process that identifies who is responsible for monitoring qualification, how status is verified, when upcoming expirations trigger action, how discrepancies are resolved, and what happens when a driver's physical or mental condition changes.

Technology can improve this process through automated expiration alerts, electronic document management, compliance dashboards, and exception reporting. AI-assisted systems can also help identify missing information and prioritize records requiring human review. Technology should support informed compliance decisions, not replace them.

The objective is simple: before a driver operates, management should be able to demonstrate why it reasonably believes that driver is currently qualified to perform the *safety-sensitive* work assigned.

When It's Time for an Independent Review

If your organization still relies primarily on medical-card copies, spreadsheets, individual employee knowledge, or last-minute expiration reminders, your medical qualification process may deserve closer examination.

An independent review can help determine whether your procedures reflect current requirements, identify gaps between written policy and actual practice, and evaluate whether your organization can consistently demonstrate continuing Driver Qualification.

About CPO Consulting™

CPO Consulting™ helps motor carriers strengthen transportation safety and regulatory compliance through independent assessments, practical guidance, and evidence-based recommendations.

Our approach focuses on helping organizations develop sustainable compliance systems that improve consistency, strengthen accountability, and reduce operational risk.

Continue the Conversation

Does your organization manage medical qualification, or does it manage medical cards?

If you are uncertain whether your current process reflects today's medical certification requirements, CPO Consulting™ can provide an independent assessment of your Driver Qualification practices and help identify areas requiring attention.

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