Should violations that occurred before the Clearinghouse Implementation Date be reported to the Clearinghouse?

No. The Clearinghouse contains only violations that occurred on or after January 6, 2020. If a driver’s violation occurred prior to January 6, 2020, and was in the return-to-duty (RTD) process when the Clearinghouse was implemented, the violation and any related RTD activity will not be entered into the Clearinghouse.