Can an employer or medical review officer (MRO) enter a drug and alcohol program violation in a CDL driver’s Clearinghouse record if the driver is not registered for the Clearinghouse?

Guidance:

Yes. When a violation is entered, the Clearinghouse associates it with a driver’s commercial driver’s license (CDL) information. This will be recorded even if the driver has not registered for the Clearinghouse. When an employer queries a driver’s information in the Clearinghouse (with the appropriate consent), they will enter the driver’s CDL information to verify if any violations are associated with that driver’s CDL.

A driver is required to enter their CDL information during their Clearinghouse registration. This allows them to view any violation or return-to-duty (RTD) information associated with their CDL.