



Fleet Safe Solutions

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Comments Submitted Via:
<https://www.regulations.gov/>

Derrick Carrington
Drug and Alcohol Programs Division
Department of Transportation
Federal Motor Carrier Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

**Re: Agency Information Collection Activities; Renewal of an Approved Information
Collection: Commercial Driver's License Drug and Alcohol Clearinghouse
Docket No. FMCSA-2026-0727**

Dear Mr. Carrington,

Thank you for providing an opportunity to submit public comments regarding the information collection process for the Federal Motor Carrier Safety Administration's (FMCSA) Clearinghouse.

FleetSafe Solutions was founded by industry experts with decades of experience in safety and compliance. We are a company of trusted compliance consultants with proven approaches dedicated to keeping motor carrier (trucking and motor coach) fleets safe, compliant and up to date with the latest FMCSA regulations, DOT safety requirements, and compliance standards. With experience in small and large fleets, our team understands the unique challenges faced in the transportation industry. Through it all, one principle remains constant: safety matters most. We specialize in providing support services for companies navigating non-DOT testing requirements subject to state laws, as well as the complex regulations set forth by the Department of Transportation (DOT) and the Federal Motor Carrier Safety Administration (FMCSA). We provide Consortium/Third Party Administrator (TPA) services, and other safety compliance assistance. Our knowledgeable staff is dedicated to helping our clients understand and comply with ever-changing requirements, offering the expertise and guidance needed to keep your business running smoothly and within regulatory standards.

Our comments focus on the following point in your Federal Register Publication: Ways for the FMCSA to enhance the quality, usefulness and clarity of the collected information when it comes to the data collected for the follow-up testing process.

**Ways for the FMCSA to enhance the quality,
usefulness and clarity of the collected information**

In our work as a C/TPA, our FMCSA-regulated clients often contact us when they run a Full Query and find out an applicant is "Prohibited" or is showing a Return to Duty (RTD) history in the FMCSA's Clearinghouse. Sometimes the applicant has seen a Substance Abuse Professional (SAP) who never entered the completion of the SAP process. In other cases, the SAP has "lifted the flag" in the Clearinghouse by entering the date of the completion of the SAP process but no one has a copy of the Follow Up Testing Plan. It can be a challenge locating the original SAP for the Follow Up Plan for various reasons. Frequently, the hiring employer is unable to obtain the SAP information from the previous employer, because the SAP has retired, is deceased or the practice has been closed. This makes the limited data available through the Clearinghouse less useful and clear.

When this happens, the only option is to start the process over with a new SAP. Starting over with a new SAP negates any evaluations, treatment and Follow Up tests the driver may have completed. As many employers will not pay for SAP evaluations, treatment, etc, the driver has to pay for these services all over again. Asking a driver to pay for these services a second time, through no fault of their own, is an unfair option.

To make the data on the RTD history in the Clearinghouse more useful and clear, thereby enhancing the quality, we respectfully recommend:

1. Add a location where the SAP can upload the follow up plan, This should not be accessible to the driver, only employers, prospective employers and C/TPA's designated by the employer.
2. Add a location where completed Follow Up Tests can be uploaded.

If these two important additions are made, the clarity of the RTD information would be greatly improved. Having this information accessible to employers would greatly facilitate a smooth and accurate transition of this critical information during the hiring process. These additions would require minimal data entry at the front-end and would be extremely cost effective because they would reduce costs for the drivers and the employers on the back end of the process. Furthermore, making these changes would enhance safety and support employers who are willing to hire a driver with a past violation, as long as the driver continues to show they are complying with the Follow Up Testing Plan.

Respectfully,

Kimberley Lacy
Chief Executive Officer, FleetSafe Solutions, LLC