



Illinois Department of Financial and Professional Regulation

Division of Professional Regulation

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Guidance to Applicants for Mental Health Professional Licensure with Face-to-Face Supervision or Experiential Requirements

On March 9, 2020, Governor JB Pritzker declared all counties in the State of Illinois as a disaster area in response to the outbreak of COVID-19, and again on April 1, 2020 declared all counties as a disaster area in response to the exponential spread of COVID-19. On March 19, 2020, Governor Pritzker issued Executive Order 2020-9 on telehealth services (Executive Order to Expand Telehealth Services and Protect Health Care Providers in Response to COVID-19). The Executive Order recognized that “the CDC, taking note of a need to reduce unnecessary healthcare visits and prevent transmission of respiratory viruses at healthcare facilities, currently recommends that healthcare providers increase the use of telehealth systems, formal or otherwise, to access and care for patients to decrease the volume of persons seeking care in facilities.” The Executive Order further noted the need to “take measures to ensure the provision and coverage of health care services while the public and health care providers are subject to quarantine.”

The Department’s Division of Professional Regulation (the “Division”) is issuing the following guidance.

The following mental health professions: Professional Counseling, Marriage and Family Therapy, Social Work, Clinical Social Work, Clinical Psychology, and Prescribing Psychology, have varying degrees of face-to-face clinical, supervisory, or experiential requirements necessary for licensure. With the exception of the distinction for Licensed Clinical Professional Counselors (see below), all other practice acts listed above are silent as to the method of face-to-face communication required by statute. Such requirements do not mandate in-person contact for which virtual face-to-face telecommunications would be insufficient. Therefore, such face-to-face requirements may be completed face-to-face via telecommunications (Skype, Video Conferencing, Zoom, Google Hangout, etc.). Electronic therapy must be in compliance with applicable Professional Code of Ethics and HIPAA standards.

In person requirements may be in place due to accreditation standards and/or graduate program requirements, but Illinois Department of Financial and Professional Regulation educational and experiential requirements for licensure do not prohibit electronic face-to-face communication.

The following Variance was granted on April 6, 2020 for Clinical Professional Counselors:
<https://www.idfpr.com/Forms/COVID19/6-Variance%20for%20Clinical%20Professional%20Counselor%20License%20Applicants.pdf>

The Variance temporarily waives the prohibition of telecommunications as modes of obtaining supervision hours and allows applicants for licensure as Clinical Professional Counselors to complete their live/in-person supervision using real-time video or audio technology.