



IDFPR

Illinois Department of Financial and Professional Regulation

Division of Professional Regulation

www.idfpr.com

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Questions Regarding the International Medical Graduate (IMG) Application and Application Process

- 1. Where is the access to information, application forms, supporting documentation required, other eligibility requirements such as Supervisory MD/DO application or endorsement form?**

All information can be found on the Department's website below:

[State of Illinois | Department of Financial & Professional Regulation \(idfpr.com\)](http://State of Illinois | Department of Financial & Professional Regulation (idfpr.com))

- 2. What are the eligibility criteria for the IMG temporary authorization?**

Education requirements:

- a. Are passed step 1, 2 and 3 only requirements?

IMGs must have passed all three steps of the USMLE, have their education certified by ECFMG, and have a license in their country of origin

- b. How will this be verified. Transcripts or only score?

The Department will verify USMLE scores and may require transcripts.

- c. Are there any educational restrictions on time gaps?

There are no restrictions on time gaps from the Department, but institutions and delegating physicians may set their own requirements.

- 3. Is there an application fee?**

There is no application fee associated with working under the proclamation.

- 4. What is the time frame for the IMG temporary authorization application to remain active?**

The proclamation is valid during the Gubernational COVID-19 Disaster Proclamations.

- 5. Does the IMG need an out-of-country medical license prior to applying for the authorization?**

Yes. An IMG does need a license issued from an international country prior to being able to work under the proclamation.

6. What is the expected turn-around time for approval of the temporary authorization?

The Department reviews all applications in the order they are received. We anticipate reviewing applications as quickly as possible; however, the time frame for initial review may vary depending on various factors such as office closures or the number of applications received. Failure to answer all the questions or properly fill complete the application form can result in additional delay. If you have any questions or concerns about an application, please reach out to the Department at 1-800-560-6420.

7. Is there a specific department or are there personnel assigned to issue the temporary authorization?

All applications are reviewed by DPR's Licensing and Testing Section. Applications and questions related to IMG applications can be sent to fpr.covidtemporaryapplication@illinois.gov.

8. If the IMG applicant does not meet all the listed eligibility criteria, what are the next steps?

The Department will contact the applicant and work with them to the extent possible.

9. Is taxonomy enrollment needed (Internal Medicine, Family medicine, etc)?

There are no taxonomy requirements under the proclamation.

10. Are NPI/NPPES enrollment needed?

The Department does not require this, however, institutions and delegating physicians may.

11. How is the issuance, renewal, termination (30 days to apply for extension, etc)?

The Department is not issuing any permits under the proclamation and, as such, there is no renewal requirement. Termination of the temporary practice permit will occur at the end of the Gubernational COVID-19 Disaster Proclamation or at when a new proclamation is issued on this topic.

12. Will there be a background check?

Background checks may be required by institutions or delegating physicians.

13. Are applicants required to submit supporting documentation?

No. Applicants are not required to submit supporting documentation, but they must attest to meeting the requirements. The Department may, in its discretion, request documentation from an applicant.

14. Does the applicant need to list the supervising physician on the application or inform the Department of the same?

No.

15. Do Applicants need to be a reside in the State of Illinois?

No. Applicants do not need to reside in Illinois. However, the supervising physician must have an active, unencumbered license in Illinois.

16. Is there a certain year that applicant must have graduated from medical school?

No.

17. Insurance contract enrollments? PECOS for Medicare? CAQH for commercial insurance? Any other specific credentialing process needed?

The Department does not regulate insurance enrollment. Credentialing is required pursuant to all applicable statutes and regulations.

Questions Regarding Employment and Compensation

18. Does IDFPR assign roles and responsibilities to the IMG?

No. The Department does not assign roles or responsibilities. That decision is left to the delegating physician and institution the IMG decides to work in.

19. Which work settings can the IMG perform clinical duties? Are there restrictions on places of service?

IMGs can perform work in any setting so long as a supervising physician delegates the authority to the IMG. Place of services are not restricted specifically by the proclamation so long as the supervision requirements outlined in the proclamation are met.

20. Does IDFPR have specific work hour rules for the IMG?

The Department does not have any work hour rules for IMGs working under the proclamation.

21. Does IDFPR have a specific reimbursement requirement for IMG's?

The Department does not reimburse and does not regulate reimbursement for IMGs. Local, state, and federal labor laws may apply.

22. Will IDFPR provide assistance in securing paid positions to IMG applicants?

The Department will not provide assistance in securing positions to IMGs.

23. Are Visa sponsorship options available or temporary work permits?

The Department recommends consulting with an immigration attorney for all available options. The Department does not have statutory authority to grant visa sponsorship.

24. Would there be relocation expenses?

The Department does not have statutory authority to provide relocation expenses. Institutions may offer them on their own initiative.

25. Is Malpractice insurance required?

The Department has no requirements for malpractice insurance. Malpractice insurance may be required by the institution or delegating physician.

26. Are there CME requirements for IMG's?

There are no CME requirements pursuant to the proclamation. Institutions and delegating physicians may put in place their own CME requirements.

Questions about Regulation and Scope of Practice

27. What Government agency regulates this?

The Illinois Department of Financial and Professional Regulation (IDFPR) is primarily responsible for regulating all medical professionals working under the delegation authority of licensed physicians.

28. What is the scope of practice and prescription limitations, controlled substances, administering schedules, DEA?

IMGs under the proclamation will perform all patient care under the supervision of licensed delegating physician. IMGs do not qualify for a controlled substance license in Illinois and independent prescription authority.

29. Will IDFPR regulate the IMG's quality of care?

The Department will regulate the quality of care through the delegating physician. IMGs are not licensed by the Department and only fall under the jurisdiction of the Department if they practice outside the scope of the proclamation.

30. Will the IMG provide patient care independently or under the supervision of a licensed physician?

IMG's working under the proclamation must work under the supervision of a physician licensed to practice medicine in all of its branches.

31. Would it be a conflict entering into residency program while on an Illinois permit?

This would not create a conflict. However, any person entering into a residency program is still required to apply for and obtain a temporary medical permit under the Illinois Medical Practice Act.

32. Are there any billing regulations?

The Department does not regulate billing practices

33. Are there allowed responsibility delegations?

IMGs are only allowed to delegate responsibility to the extent an unlicensed person can.

34. Are there Co-signature requirements?

There are no co-signature requirements in the proclamation, however, institutions and delegating physicians may have their own co-signature requirements for patient care documentation.

35. Are there restrictions on what patients are within scope (new patients or established only)?

There are no restrictions on the scope from the Department, however, institutions and delegating physicians may place these restrictions in place.

36. Does the permit include clinical procedures?

Under the proclamation, an IMG may perform any procedures delegated to them by the licensed supervising physician not otherwise restricted by law.

37. What is required in the supervisory, cooperative practice arrangements?

The requirements can be found in the Medical Practice Act, specifically Section 49.

38. Will this regulation be foundational for a legislature licensing law project (like Missouri and Washington state)?

The Department does not have plans to introduce any additional licensing acts based on this proclamation at this time.

39. Who is liable professional and legal liability for actions (violations, disciplinary authorities)?

The delegating physician may be liable for professional liability if they do not follow the delegating requirements of the Illinois Medical Practice Act and Rules. Civil liability is not within the Department's purview.

40. What would be the title (IMG Temporary Clinician, for example) and practice protections?

The proclamation does not provide any title protection or practice protections.