

CORONAVIRUS INFORMATION & UPDATES

April 3, 2020

Reinstatement of Illinois Medical and Other Health Care Licenses and The Introduction of Temporary Practice Permits for Out-of-State Practitioners

On March 19, 2020, Governor J.B. Pritzker issued [Executive Order 2020-09](#) (the “Executive Order”), which aims to expand access to health care services during the COVID-19 pandemic. Although the Executive Order primarily addresses telehealth services, it also contains a provision which applies to those Illinois-licensed physicians whose licenses became inactive within the last three years, which is designed to facilitate their temporary re-licensure to help combat the spread of COVID-19. The Illinois Department of Financial and Professional Regulation (“IDFPR”) issued regulations the following day which allow for a similar pathway of reentry for certain nurses, respiratory care therapists, and physician assistants with recently inactive licensure. Relatedly, on March 23, 2020, IDFPR also created an expedited pathway for certain physicians, nurses, respiratory care therapists, and physician assistants with out-of-state licenses to temporarily practice in Illinois to combat the COVID-19 pandemic.

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1. **Illinois-Licensed Physician Reinstatement Process.** The Executive Order, which IDFPR implemented, waives the following requirements for physician license reinstatement: (i) payment of required renewal fees, (ii) proof of completion of continuing education requirements, such as 150 hours of continuing education for licensees with expired licenses, and (iii) completion of a physician profile. These expedited licensing and waivers to allow for such reinstatements (“Variances”), as well as the [reinstatement form](#) published by IDFPR on March 23, 2020, apply only to those physicians in good standing whose licenses were either (i) active and in good standing as of July 31, 2017, or (ii) placed on inactive status or lapsed after July 31, 2017. Physicians interested in reinstatement need only submit the [reinstatement form](#). Upon reinstatement, a physician may work under the direction of the Illinois Emergency Management Agency and the Illinois Department of Public Health, or in a state licensed long-term care facility, state regulated hospital, or federally qualified health center. Any license reinstated under the Executive Order and the Variances expires on September 30, 2020. Applicants may request expedited review of their reinstatement form by contacting fpr.lmu@illinois.gov.
2. **Eligibility for Other Illinois Health Care Providers.** The Variances also waive professional license reinstatement requirements related to license fees and continuing education for registered nurses, advanced practiced registered nurses, licensed practical nurses, respiratory care therapists, and physician assistants with such expired or inactive Illinois licenses.¹ These practitioners are not eligible for license reinstatement if their Illinois license was revoked, or if their license was suspended or encumbered at the time it expired or was moved to inactive status. Practitioners may apply for temporary reinstatement of their licenses using the following renewal [form](#). A reinstated license is

¹ Per the Variances, physician assistants are eligible if their licenses have been inactive or expired for less than three years. Registered nurses, licensed practical nurses, advanced practice registered nurses, and respiratory care therapists are eligible if their licenses have been inactive or expired for less than five years. However, the application forms themselves and the IDFPR [FAQs](#) indicate that all health care providers eligible for reinstatement other than physicians must have had licenses that were in good standing as of January 1, 2016.

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valid until September 30, 2020. During the period for which a license is reactivated, the practitioner may only (i) provide treatment in response to the COVID-19 outbreak, and (ii) work under the direction of the Illinois Emergency Management Agency and the Illinois Department of Public Health, or in a state licensed long-term care facility, state regulated hospital, or federally qualified health center. Applicants may request expedited review of their reinstatement form by contacting fpr.lmu@illinois.gov.

- Out-of-State Practitioners.** On March 23, 2020, the Secretary of IDFPR separately issued a [proclamation](#) that enables out-of-state practitioners with licenses in good standing in the jurisdiction of issuance to receive a grant of temporary authority to practice in Illinois. Applicable license types include licensed practical nurses, registered nurses, advanced practice registered nurses, respiratory care therapists, physician assistants, and physicians. An application for a temporary permit to practice in Illinois must be submitted to IDFPR using the following [form](#). If granted, a temporary practice permit is valid until September 30, 2020. During the period for which the permit is active, the practitioner may only (i) provide treatment in response to the COVID-19 outbreak, and (ii) work under the direction of the Illinois Emergency Management Agency and the Illinois Department of Public Health in a state licensed long-term care facility, state regulated hospital, or federally qualified health center. Interested practitioners will be required to provide their date of arrival and date of departure on a form to be provided by IDFPR in the future. Applicants may request expedited review of their reinstatement form by contacting fpr.lmu@illinois.gov.
- Ineligible Health Care Licensees.** Health care professionals that are interested in resuming practice to combat COVID-19, but ineligible for temporary reinstatement of their licenses under the Variances, should follow the existing reinstatement requirements applicable to their profession. This includes physicians and physician assistants with licenses that have been inactive for more than three years, as well as licensed practical nurses, registered nurses, advanced practice registered nurses, and respiratory care therapists with licenses that have been inactive for more than five years. Interested professionals may select from the following links to determine the applicable requirements: [nursing](#), [physicians](#), [physician assistants](#), [respiratory care therapists](#).