Illinois Health and Hospital Association

September 19, 2025

The Illinois Dept. of Financial and Professional Regulation (IDFPR) has adopted amendments to the Medical Practice Act of 1987 (68 Ill. Adm. Code 1285) (Sept. 12 *Illinois Register*, pages 11270 to 11287). The adopted amendments, which are now effective, create a pathway to full physician licensure for international medical graduates (IMG) in Illinois. An IDFPR press release can be viewed *here*.

Under these rules, an IMG can seek full licensure to practice medicine in Illinois through a three-step process. The following provides a high-level summary of those steps.

Step 1: IMG Physician Limited License

Individuals who have had medical training in another country and meet certain outlined criteria in the regulations may apply for a limited license to practice medicine. These individuals may only practice under an agreement with a sponsoring entity, which includes hospitals and multi-specialty medical practices or clinics with two or more physicians that participate in graduate medical education.

The sponsoring entity must designate a supervisor who has an unrestricted physician license and has never been disciplined by the state. Further, the supervisor must be either board certified or actively participating in their maintenance of certification in the specialty to which the limited license holder is pursuing.

The limited license is valid for two years.

Step 2: IMG Physician Restricted License

Upon successful completion of the two-year limited license, an individual may then apply for a restricted physician license. Restriction in licensure is only for the purposes of location, as the individual may practice independently as long as it is within the confines of a federal Health Resources and Services Administration designated Health Professional Shortage Area, Medically Underserved Area, or serves a Medically Underserved Population. While a restricted license holder may practice independently, they are not permitted to engage in solo practice or in telemedicine.

The restricted license is valid for an additional two years.

Step 3: Full Licensure

Upon completion of two years in practice under a restricted license in one of the specified areas, an individual may then apply for a full unrestricted license to practice medicine in all its branches.

IHA supported these regulations, as well as the underlying legislation, as a significant approach to tackling the healthcare workforce issues that Illinois is experiencing. As this program evolves, hospitals are encouraged to reach out should they see ways to further enhance and build upon what is in place.

Contact Us with questions.