

Policy Title:	HOUSE STAFF LICENSURE POLICY
Most Recent Approval Date:	June 23, 2025
Contact:	Rush University Medical Center Designated Institutional Official (DIO)
Related Policies/Documents:	<ol style="list-style-type: none"> 1. House Staff Agreement 2. Recruitment, Eligibility, Selection, and Appointment Policy 3. Completion of Step 3 Licensing Exam (USMLE, COMLEX) 4. Orientation Policy
Regulatory Elements:	Medical Practice Act of 1987; 2025 ACGME Institutional Requirements [4.2-4.2.a.3.]; 2025 ACGME Common Program Requirements [3.2- 3.3.b.2.]

Scope:

All Graduate Medical Education (GME) Programs and visiting house staff under the oversight of the Rush University Medical Center (RUSH) Designated Institutional Official (DIO). This policy applies to both accredited and non-accredited GME Programs, except as otherwise specifically stated.

The Graduate Medical Education Committee (GMEC) exempts the Psychology and the Medical Physics residency programs from this policy. The state of Illinois does not have a licensure requirement for house staff training in these allied health specialties.

Purpose:

Residents/Fellows must hold a current medical license to practice medicine. All House Staff have a contractual and regulatory obligation to maintain compliance with this policy.

Policy:

The Illinois Department of Financial and Professional Regulation (IDFPR) is the state entity that regulates licensure for professionals in the state of Illinois. All house staff must possess an active medical license issued by the State of Illinois to participate in any Graduate Medical Education program at Rush University Medical Center or any of its participating sites as outlined in the House Staff Agreement. House staff who do not possess a current, valid medical license in the State of Illinois may not begin or continue their training as a house staff member until they have received an appropriate Illinois license. To do otherwise would be construed by the IDFPR as practicing medicine without a license, which is a criminal offense.

I. Licensure Application and Renewal Process

All licensure application information and written instructions are communicated via email to house staff. Details are also posted on the *GME house staff licensure page on the Rush GME website with information about licensure, IDFPR eligibility requirements, and the application process.*

It is the house staff member's responsibility to complete the application requirements as outlined by the GME Office in a timely manner while adhering to all assigned deadlines. House staff will provide documentation to verify timely completion of the licensure application upon request by the GME Office.

House staff with an appointment in a program that is not accredited by the ACGME ("non-ACGME programs"), who will be eligible for permanent licensure at the starting date of the training program or during a mid-training reapplication cycle, should apply for a permanent license to mitigate risk as enforced by the IDFPR. Temporary licensure applications of house staff in non-ACGME programs may require additional supporting documentation, increased processing time, and undergo a Medical Board review at the discretion of the IDFPR.

Questions, concerns, and all communications regarding house staff medical licensure shall be directed to the GME Office Licensure Liaison.

II. Lapse in Licensure for Continuing/Promoting House Staff

House staff are not eligible to receive academic or training credit for any period when they are unlicensed. Failure to maintain a current medical license during training violates the obligations of the house member as outlined in the House Staff Agreement and may be grounds for dismissal at the discretion of the Program Director. In the event there is a lapse in licensure, the following will protocol shall occur -

- a. Program director will be notified by the GME Office in writing.
- b. House staff member will be placed on an unpaid administrative leave.
- c. The house staff member is strictly prohibited from completing any clinical, research, shadowing/observerships, or administrative activities while unlicensed and placed on unpaid administrative leave. Vacation, sick, and wellness time also cannot be applied to this time.
- d. Return to training will be contingent on the issuance or reinstatement of the appropriate license with the IDFPR.

III. Visiting Physician Licensure

House staff assigned to complete visiting rotations in GME programs must provide evidence of a current medical license to practice medicine in the State of Illinois, consistent with the Illinois Department of Financial and Professional Regulation (IDFPR) prior to starting any assignment at Rush. Failure to obtain or provide evidence in a timely manner may result in the delayed start or cancellation of visiting rotations. *Please visit the GME Visiting Physicians page on the Rush GME website for more information about visiting physician qualifications and onboarding.*

a. In-State Physicians

The visiting physician from an Illinois institution must hold a valid Illinois medical license, either a temporary or permanent license.

b. Out-of-State Physicians

When the Rush GME Office approves a rotation, an out-of-state visiting resident must apply for an Illinois license. All license applications must be submitted to the IDFPR 90 days before the scheduled rotation start date. There are three licensing application options available through the IDFPR: 1) Limited Temporary License (period of assignment); 2) IDFPR Visiting Resident Exemption Form (only eligible for 90 days or less practicing in the state); and 3) Permanent License.

IV. Fees

The house staff member must incur licensure fees. While the GME Office does not reimburse licensure fees, departments or specific programs may have policies permitting reimbursement using a departmental Accounting Unit (AU).

The Rush values of Innovation, Collaboration, Accountability, Respect, and Excellence provides the foundation of how we treat each other, our patients, and their loved ones.