

Governor's Office of Management and Budget

Alexis Sturm

Director



Regulatory Sunset Act Study of Clinical Psychologist Licensing Act

May 8, 2026

**To the Honorable JB Pritzker
Governor of Illinois**

Governor Pritzker:

As required by Section 5 of the Regulatory Sunset Act (5 ILCS 80/1 et seq.), GOMB facilitated a study with the Illinois Department of Financial and Professional Regulation (IDFPR), the agency responsible for oversight of the Clinical Psychologist Licensing Act (225 ILCS 15/1 et seq.) (the Act), which is scheduled to be repealed on January 1, 2027. This study provides justification for the recommendation to continue this Act.

GOMB's examination of this Act was conducted considering the factors set out in Sections 6 and 7 of the Regulatory Sunset Act. The following report outlines the work of GOMB's study and details the criteria and data utilized to arrive at the above recommendation.

Respectfully,

Alexis Sturm
Director
Governor's Office of Management and Budget

GOMB Regulatory Sunset Act Report: Clinical Psychologist Licensing Act

The State of Illinois, acting through the Illinois Department of Financial and Professional Regulation (IDFPR), licenses the profession of clinical psychology and prescribing clinical psychology. Prescribing clinical psychology is a subspecialty of clinical psychology and requires a second license, pursuant to the Act.

The scope of responsibilities of the clinical psychology profession consists of the independent evaluation, classification, diagnosis, and treatment of mental, emotional, behavioral or nervous disorders or conditions, developmental disabilities, alcoholism and substance abuse, disorders of habit or conduct, and the psychological aspects of physical illness. The practice of clinical psychology includes psychoeducational evaluation, therapy, remediation and consultation, the use of psychological and neuropsychological testing, assessment, psychotherapy, psychoanalysis, hypnosis, biofeedback, and behavioral modification when any of these are used for the purpose of preventing or eliminating psychopathology, or for the amelioration of psychological disorders of individuals or groups. The scope of responsibilities of the prescribing psychologist profession, in addition to those of the clinical psychology profession, consists of the ability to prescribe, administer, discontinue, or distribute drugs or medicines to their clients for the treatment of mental health disease or illness, as delegated by a collaborating physician.

The practice of psychotherapy, administration of psychological testing, and prescribing of drugs are practices that deeply impact the mental and physical health of the public. By requiring persons to meet professional standards for education and training as a condition to provide these services, IDFPR ensures the public is not harmed by unqualified individuals. Additionally, IDFPR is empowered to investigate complaints against clinical psychologists and prescribing psychologists and take disciplinary action against them when warranted.

1. License Count and Fee Structure (5 ILCS 80/6(1) and (3))

As of July 2025, IDFPR states that there are 5,849 active licenses for clinical psychologists and 22 active licenses for prescribing psychologists in Illinois. See the following table for the number of licenses issued by IDFPR under this act in the fiscal years indicated:

License Type	FY21	FY22	FY23	FY24	FY25
Licensed Clinical Psychologist	248	239	199	246	332
Prescribing Psychologist	7	6	5	7	4

Clinical psychologists have the following licensure fee structure:

License, Credential, or Certification Type	Fee Amount	Online Payment Option
Application Fee	\$50	<input checked="" type="checkbox"/>
Renewal Fee	\$160 every two years	<input checked="" type="checkbox"/>
Duplicate Fee	\$ N/A	<input type="checkbox"/>
Examination Fee	\$707	<input checked="" type="checkbox"/>

Endorsement Fee	\$100	<input checked="" type="checkbox"/>
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Prescribing psychologists have the following licensure fee structure:

License, Credential, or Certification Type	Fee Amount	Online Payment Option
Application Fee	\$150	<input checked="" type="checkbox"/>
Renewal Fee	\$300 every two years	<input checked="" type="checkbox"/>
Duplicate Fee	\$N/A	<input type="checkbox"/>
Examination Fee	\$825	<input checked="" type="checkbox"/>
Endorsement Fee	\$100	<input type="checkbox"/>

2. Obtaining Certification in Illinois (5 ILCS 80/6(11))

Clinical psychologist applicants are required to submit an application through the Department's CORE licensing system which provides a step-by-step process for applying. Those requirements are specified in 68 IL Admin. Code 1400.120.

Once the requirements are met, the applicant is notified of their eligibility to sit for the Examination for Professional Practice in Psychology. The exam for a clinical psychologist license may be taken at any Pearson Vue testing center. The exam for a prescribing psychologist license may be taken at any Kryterion Testing Network testing center. The passing score is set by the testing entity, the Association of State and Provincial Psychology Boards. As an alternative, an applicant may provide proof of passage of the examination in clinical or counseling psychology of the American Board of Professional Psychology.

Prescribing psychologist applicants are required to be licensed as a clinical psychologist, then must submit an application downloaded from the Department's website. The requirements for licensure are specified in 68 IL Admin. Code 1400.200.

The applicant is required to pass the Psychopharmacology Examination for Psychologists. Continental Testing Service, Inc. communicates approval for applicants to sit for the exam to Association of State and Provincial Psychology Boards on behalf of IDFPR and retrieves score results. Continental Testing Services, Inc. forwards the results to IDFPR in a file format that allows the license to be issued automatically upon completion of the required exam.

3. Equity Concerns (5 ILCS 80/6(10), (12) and (13))

IDFPR states that equity issues may have an impact on individuals seeking to become a licensed Clinical Psychologist in the State of Illinois. These issues include financial challenges such as the cost to obtain licensure and the failure to complete licensure due to access to training, education, and geographic location of training and testing sites.

Persons who speak English as a second language may also have difficulty with the licensure process. IDFPR asserts that it has done its best to minimize any barriers to licensure by requiring universally

accepted qualification requirements and imposing fair standards of professionalism.

4. Agency recommendations to change the statute (5 ILCS 80/6(4) and (9))

IDFPR recommends the following:

- Improve efficiencies by providing electronic communication between IDFPR, licensees and applicants. Require applicants and licensees to provide an email address for these communications.
- To make it easier for an applicant to obtain licensure by endorsement, reduce the required proof of prior out-of-state licensure from the current twenty-year requirement to thirty months within the previous five years.
- Eliminate the requirement to apply for temporary authority to practice in Illinois when treating clients temporarily in Illinois.
- Allow individuals to use a tax ID in place of a social security number when applying for a license.
- Provide IDFPR authority to take action against unlicensed students, interns, and residents if they violate the Act or Rules providing psychological services to the public while obtaining required experience.

5. Agency efforts to comply with enabling laws (5 ILCS 80/6(3), (4) and (5))

At the time of this study, GOMB is not aware of any compliance issues by IDFPR related to the provisions of the Act.

6. Recent bills introduced by the General Assembly (5 ILCS 80/6(9))

According to IDFPR, in the last five years, P.A. 102-1053 and P.A. 102-1117 were introduced by the General Assembly and passed into law.

P.A. 102-1053 changes the requirements for restoration of inactive or expired license of less than 5 years without disciplinary action taken against their license in Illinois or any other jurisdiction.

P.A. 102-1117 clarifies grounds for disciplinary action and adds protections that prohibit Illinois from disciplining licensed clinical psychologists solely for providing lawful health care services, even if those services are restricted in another state. It also ensures that out-of-state disciplinary actions based solely on such lawful services cannot be used as the basis for discipline in Illinois.

7. Stakeholder Feedback and Protocols (5 ILCS 80/6(5), (6), (7), (8), (10) and 5 ILCS 80/70)

IDFPR holds public board meetings of the Clinical Psychologists Licensing and Disciplinary Board where discussions about the status of this Act and the profession take place. IDFPR also receives and responds to inquiries and feedback it receives from the public by email and through its website. As needed, IDFPR proposes rules and reaches out to associations in the industry for feedback. Additionally, the Department investigates complaints.

8. Public Outreach (5 ILCS 80/6(5), (6), (7) and (8) and 5 ILCS 80/7)

IDFPR provides multiple avenues for members of the public to contact the Department with comments or concerns about the programs it oversees or the Department's rules governing its programs. IDFPR conducts public outreach efforts through social media and other external-facing means.

As part of the JCAR administrative rules process, with approval from the Governor's Office, IDFPR shares draft rules with board members and associations in the industry for their feedback. After the First Notice, IDFPR participates in the public comment process. Public comments are reviewed by the Department and, where applicable, the Department incorporates proposed changes into its Second Notice rules to JCAR. When the Department disagrees with proposed changes, it provides justification.

9. Industry Standards (5 ILCS 80/6(11) and (12))

IDFPR states that the qualifications required for this profession in Illinois are consistent with industry standards.

For a clinical psychologist license, states generally require, at minimum, a doctoral degree in psychology (PhD or PsyD), supervised clinical experience, and passing the Examination for Professional Practice in Psychology (EPPP). For a prescribing psychologist, in addition to the qualifications above, at a minimum states generally require completion of a post-doctoral master's degree in clinical psychopharmacology, passing a national psychopharmacology exam, and completing supervised clinical experience.

The biggest potential harm to the psychology industry is reputation. By ensuring licensed psychologists practice their profession ethically and competently, the profession's good reputation with the public is maintained. Minimal standards in other midwestern states and comparable states are substantially the same as in Illinois. Most other states also utilize the same requirements.

10. Public Complaint Resolution (5 ILCS 80/6(3), (7), (8) and (10) and 5 ILCS 80/7)

The table below shows the number of complaints IDFPR has received from the public and/or members of this regulated profession in each of the last five fiscal years.

Complaints	FY21	FY22	FY23	FY24	FY25
Clinical psychologist	99	120	100	107	134
Prescribing psychologists	0	0	0	0	0

Complaints may be closed by investigations or prosecutions depending on the violation and the presence of clear and convincing evidence. If a case becomes a disciplinary matter, the IDFPR Director issues the final administrative order in the form of a consent order. Or, a disciplinary hearing with an administrative law judge may deliver a recommendation to the Board which escalates the recommendation to the IDFPR Director.

Normal issues can take six to seven months to reach resolution. When the Respondent participates in the process it can take up to a year or more, depending on the allegations involved. Matters can be resolved by agreement between the Department and Respondent in an informal conference. If the Respondent requests continuances, or if it goes to formal hearing and then findings are made by the administrative law judge, with a Director's Order to follow. Similar to litigation, many variables can impact the time from complaint to resolution.

11. Disciplinary Action (5 ILCS 80/6(14))

IDFPR's authority to enforce the Act ensures that allegations of professional incompetence, gross negligence, malpractice, and unprofessional conduct are investigated and that substantiated allegations

are prosecuted by the IDFPR for appropriate discipline.

12. Conclusion

The Act governs the licensure of clinical psychologists and prescribing clinical psychologists in the State of Illinois. The absence of licensing criteria for these professions would pose a significant and direct harm to the health, safety, and welfare of the public and specifically the State's healthcare system. The lack of regulation would eliminate the professional standards for the individuals in this sector of Illinois' healthcare system.

IDFPR's authority under this Act protects the public's health, safety, and welfare by allowing the Department to review the qualifications of these professions in Illinois to ensure that individuals have completed the requisite education, examinations, and training to practice their profession with reasonable judgment, skill, and safety. The provisions within the Act and the Rules have been modeled with the intent of ensuring the public's health, safety, and welfare are the principal focus. The promulgated provisions of the Act and the Rules mitigate risk by establishing a basis for determining whether an applicant for licensure is fit to practice in Illinois.

Based on the factors in 5 ILCS 80/6 and the additional criteria in 5 ILCS 80/7, GOMB finds that the Act should be recommended for continuation. The record should expressly state that the public protection benefits of regulation outweigh the regulatory costs and that no less restrictive alternative would adequately address the significant and discernible harms identified in this report.

The Act should be continued to promote and enhance the safety and welfare of the public, without burdening licensees or commerce.