



January 16, 2023

Steffanie Garrett  
General Counsel  
Illinois Department of Healthcare and Family Services (HFS)  
201 South Grand Avenue East, 3rd Floor  
Springfield IL 62763-0002

Ms. Garrett:

On behalf of LeadingAge Illinois, thank you for the opportunity to comment on the Department's proposed rule changes regarding the Supportive Living Program (**Specialized Health Care Delivery Systems, 89 Ill. Adm. Code 146**). **These rules appeared in the December 9, 2022 edition of the Illinois Register.**

LeadingAge Illinois represents the complete continuum of care for older adults, including Supportive Living. We appreciate the Department's work to ensure that residents enjoy a quality and necessary. We appreciate the opportunity to provide comments on the proposed rules.

**Comments:**

**Section 146.210 Structural Requirements:**

Food shall be stored, prepared and cooked on-site in a full service kitchen. The food shall be freshly prepared each day and served in a central dining area.

**LeadingAge Illinois Comment:**

There are a number of situations in which there cannot be a meal(s) cooked on-site. We would ask for the Department to consider allowing providers the opportunity to bring meals in under certain circumstances, with proper notice, or with Department approval after explanation.

**Section 146.235 Staffing:**

Must possess current Cardiopulmonary Resuscitation (CPR) certification as a condition of employment.

**LeadingAge Illinois Comment:**

This could place undue challenges for providers looking to hire CNAs. One example is if the CNA has not worked in the field for a while. We would ask that the Department allow for the CNA to be hired and given a certain number of days to complete the certification to comply with the regulations.

Again, thank you for the opportunity to comment on the proposed rules. Please feel free to contact me anytime with questions at 630.325.6170 or [aschnepf@leadingageil.org](mailto:aschnepf@leadingageil.org).

Kindest regards,

A handwritten signature in black ink that reads "Angela Schnepf". The signature is written in a cursive, flowing style.

Angela Schnepf  
President and CEO