Medicaid Division

CCO Operations Unit / 1115 Waiver Strategic Operations



Date: July 18, 2025

To: Coordinated Care Organizations (CCOs)

From: David Inbody, CCO Operations Director

Jessi Wilson, 1115 Waiver Strategic Operations Director

Subject: HRSN Housing Supports service authorization decision-making timeframe

Beginning August 1, 2025, the Oregon Health Authority (OHA) will no longer defer enforcement of the *entire* timeframe for CCOs to make decisions about service authorization requests for Health-Related Social Needs Housing-Related Supports ("HRSN Housing Supports"). Instead, OHA will defer enforcement for an additional 14 days beyond the timeframe permitted in OAR <u>410-141-3835(12)</u>. This deferral applies to requests received by CCOs through **October 31, 2025.** This is an update to the previous deferral that applies to requests received through July 31, 2025.

The expiration of this enforcement deferral will coincide with the effective date of an emergency, temporary rule requiring an HRSN Request for the rent benefit to include *one* of the following: 1) a lease agreement signed by both the landlord and Member; 2) a completed HRSN Verification of Landlord/Tenant Relationship and Rent Owed form signed by both the landlord and Member; or 3) a written rental agreement signed by both the landlord (or equivalent entity) and Member in accordance with OAR 410-120-2005. OHA made this decision in consideration of the time needed to collect required documentation and to support improved processing of HRSN Requests. A permanent rule be effective January 1, 2026.

The standard timeframe for making decisions about HRSN service authorization requests is described in:

- OARs 410-120-2020(1) and (2) and 410-141-3835(12)(a)(A) and (d) and
- Exhibit B, Part 2, Section 15, Paragraph h, Sub-Paragraph (1) in the <u>2025</u> CCO contract.

As stated in these authorities, CCOs must decide whether to authorize or deny HRSN Requests and notify the Member about the decision within 14 days of receipt of a complete HRSN Request, with the possibility of a 14-day extension.

This deferral only applies to a 14-day timeframe following *both* the initial 14-day period and the possible 14-day extension in cases where the CCO cannot make the decision within the initial 14-day period and notifies the Member that more time is needed. In all cases, CCOs are expected to process requests received as expeditiously as possible. If the additional 14 days is needed (beyond the 28 days in rule), CCOs are encouraged to communicate this need to Members.

During this enforcement deferral, CCOs are expected to make all HRSN Housing Supports service authorization decisions no later than the 42-day timeframe described above. However, upon expiration of this timeframe, CCOs may not deny service requests in which (a) the request has not been reviewed, and (b) the member notification process has not been completed. CCOs may deny service requests if the necessary information to complete the eligibility determination cannot be collected despite reasonable attempts as described in 410-141-3835(12)(g)(A).

This enforcement deferral does not relieve CCOs of any other requirements relating to HRSN Housing Supports described in the applicable OARs and the CCO contract. Furthermore, the deferral does not extend to HRSN service delivery timeframes described in OAR 410-120-2020(13).

Over the next few months, as part of overall program improvement efforts, OHA will continue to gather more data from CCOs to inform progress on meeting service authorization as well as service delivery timelines for HRSN Housing Supports. Part of this process will include OHA sending a Notice of Investigation to some CCOs to further understand challenges in service delivery and their plans to address. These notices will be sent to impacted CCOs over the next several weeks.

Questions?

If you have questions, please contact Jessi Wilson, 1115 Waiver Strategic Operations Director at jessica.l.wilson@oha.oregon.gov.

Thank you for your continued support of the Oregon Health Plan and the services you provide to our members.