

# Memorandum

**To:** Coordinated Care Organization (CCOs)

**From:** Jessi Wilson, 1115 Waiver Strategic Operations Director

**Date:** June 25, 2025

**Subject:** Policy Clarification for HRSN Housing Supports and HUD Housing Supports

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This memo provides clarification to CCOs about how the HRSN rent and utility services intersect with other housing supports provided through the U.S. Department of Housing and Urban Development (HUD). The updates outlined in this memo are in response to CCO and HRSN Service Provider questions, and based on communications with HUD. The Oregon Health Authority (OHA) will continue to collaborate with CCOs and key partners in implementing the HRSN supports to ensure compliance across federal and state rules in support of overall program integrity.

## Background on HUD Rental Assistance Programs:

HUD's Section 8 Housing Choice Voucher (HCV) programs include several Special Purpose Voucher Programs and Other HCV initiatives. HCV programs subsidize rent for low-income individuals and families by paying the difference between the total cost of rental housing (inclusive of utility costs) and the Total Tenant Payment (TTP) (or 'tenant share of rent') – which is usually 30% of a household's income.

## Policy Clarification: Intersection between HCV and HRSN Housing Supports:

In communications with HUD, OHA confirmed the following:

- **HCV recipient requesting HRSN services for prospective (future) rent and utility costs:** HRSN services cannot duplicate or supplant other state or federally funded services. HRSN rent assistance cannot replace or pay any portion of the gross rent that is owed on behalf of an HCV recipient – which includes: (1) rent and utility costs that the HCV program pays to the landlord, and (2) the rent and

utility costs the tenant is responsible for paying (30% of household income) (see 24 CFR 982.515(c)).<sup>1</sup>

- **HCV recipient requesting HRSN services for past due rent and utility costs:** If they meet all HRSN eligibility criteria, HCV recipients may receive HRSN rent and utility assistance for rent and utility arrears. For example, if an HCV recipient's income changes, they may request a rent reduction by submitting an income recertification through their local HUD office. During the time it takes to process an income recertification a tenant might accrue rent and utility arrears. In these circumstances, HRSN-eligible members may receive HRSN assistance for past due rent and utilities as a one-time payment to prevent eviction.
- **HRSN rent and utility assistance is not counted as income:** An HRSN-eligible Member not supported by HCV may receive all HRSN housing services for which they are eligible. If they later apply for HCV, current or past HRSN support is not counted as income. HUD considers HRSN rent assistance as “nonrecurring income,” which is excluded from adjusted income in HUD eligibility calculations (24 CFR 5.600(b)(24)).

### Timing and Implementation:

This policy is effective for all new HRSN rent and utilities service authorizations beginning July 1, 2025. No retrospective action is needed for any Members authorized for HRSN rent and utilities on or before June 30, 2025.

### Questions?

If you have questions about these changes, please contact Jessi Wilson, 1115 Waiver Strategic Operations Director at [jessica.l.wilson@oha.oregon.gov](mailto: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.

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<sup>1</sup> Although some federal housing programs, such as the HCV program, permit rental assistance funds to be paid directly to the tenant to pay landlords/Public Housing Authorities (PHAs)/Multi-Family Housing (MFH) Owners for the tenant portion of rent, Oregon's HRSN program does not permit funds to flow directly to Medicaid enrollees ([PIH FAQ](#)).