



HRSN CCO FAQ Document

This document is a compilation of questions received by the Oregon Housing Authority (OHA) from Coordinated Care Organizations (CCOs) to aid in the implementation of HRSN Supports. This is a living document that will be updated on an ongoing basis.

Current as of: December 20, 2024

Contents

Cross-Cutting: Eligibility	2
Cross-Cutting: HRSN Requests	2
Cross-Cutting: Service Authorization	5
Cross-Cutting: Payment	6
Cross-Cutting: Billing	6
Cross-Cutting: PCSP	7
Cross-Cutting: Service Provider	7
Cross-Cutting: General	8
Housing: Service Eligibility and Authorization	9
Housing: Service Design – Rent/Utilities	17
Housing: Service Design – Hotel/Motel	20
Housing: Service Design – Home Modifications and Remediations.....	20
Housing: Payment.....	21
Housing: Claims/Billing.....	23
Housing: Service Providers	25
Outreach and Engagement: Service Providers	26
Outreach and Engagement: Billing.....	26
CCBF.....	27

#	Benefit Area	Topic	Publication Date	Question	Response
<i>Cross-Cutting: Eligibility</i>					
1.	Cross-Cutting	Eligibility	12/6/24	Do CCOs need proof of address to change a Member’s address in MMIS?	CCOs can update a Member address through the portal and no evidence is required.
2.	Cross-Cutting	Eligibility	12/6/24	Are HRSN Services covered for OHP Bridge Members?	No. At this time, HRSN Services are not covered for OHP Bridge Members. Any Members denied HRSN Services must receive a Notice of Adverse Benefit Determination (NOABD).
3.	Cross-Cutting	Eligibility	12/13/24	If a Member is terminated from OHP coverage before a requested service is authorized, or before an authorized service is delivered, are they eligible to receive the service?	No. If a Member's OHP service is terminated before service authorization or before a service is delivered, they are no longer eligible for that service regardless of their eligibility at the time the service request was submitted or authorized.
<i>Cross-Cutting: HRSN Requests</i>					
4.	Cross-Cutting	HRSN Requests	12/6/24	If we receive an HRSN request form for items that are not included in HRSN benefits (e.g. winter coats), does this require a denial and a NOABD?	No; per OAR 410-120-2010, the HRSN Request is used for the purpose of performing an HRSN Service Eligibility Screening, and the following components must be included in an HRSN Request: 1. Name of Member and Contact information

#	Benefit Area	Topic	Publication Date	Question	Response
					<p>2. Identification of the anticipated HRSN Service need (HRSN Services include Climate-Related Supports, Housing-Related Supports, Nutrition-Related Supports, and HRSN Outreach and Engagement services detailed in OAR 410-120-2005)</p> <p>3. A Statement that the individual wants to participate in the HRSN Eligibility Screening</p> <p>Per OAR 410-120-2010, MCEs and the Authority shall accept any HRSN Request used by an HRSN Connector (including the HRSN Request Form made available by the Authority) that complies with the requirements in this rule (i.e., the components listed above in 1-3). If the above requirements for an HRSN Request are not met, then it does not qualify as an HRSN Request, does not result in an HRSN eligibility screening, and an NOABD does not need to be issued if the CCO cannot provide what is being requested. The more appropriate route would be to educate the individual of what can be requested through HRSN and redirect them to another program for the non-HRSN request, if applicable.</p>
5.	Cross-Cutting	HRSN Requests	12/6/24	If an HRSN Request comes in without all of the necessary	Please refer to OAR 410-120-2010 for HRSN Request requirements. An

#	Benefit Area	Topic	Publication Date	Question	Response
				documentation (e.g. no scope of work for Home Modifications), would that be an invalid request for those HRSN services? Could that be voided rather than denied?	<p>incomplete HRSN Request does not result in a denial. A denial should be issued if it is determined by the CCO from an HRSN Eligibility Screening that the Member does not qualify for the service.</p> <p>Per OAR 410-120-2015, if the HRSN Connector does not include all the information in the HRSN Request that is necessary for determining whether the Member is eligible to receive an HRSN Service, the CCO shall obtain all the information necessary in order to conduct the HRSN Eligibility Screening and HRSN service authorization. This would include developing the written scope of work for Home Modifications.</p>
6.	Cross-Cutting	HRSN Requests	12/6/24	If a Member requests, and is denied, an HRSN coverable service, through HRS/Flex, does a NOABD need to be sent?	NOABDs do not need to be issued for denied HRS/Flex requests. However, if the Member requests an HRSN covered service and is requesting to be screened for eligibility for that service, then they should be screening for HRSN eligibility, and an NOABD would be required if they are determined to be ineligible, even if the CCO is planning to provide the service through HRS/Flex. Within the NOABD, the CCO should indicate that the Member will

#	Benefit Area	Topic	Publication Date	Question	Response
					receive the service through HRS/Flex, if applicable.
7.	Cross-Cutting	HRSN Requests	12/6/24	If a Member calls requesting information on HRSN services and their eligibility, does that qualify as an HRSN Request?	Requests for information about the HRSN benefits and eligibility would not qualify as an HRSN Request. An HRSN Request is done for the purposes of performing an HRSN Service Eligibility Screening. Refer to the OAR 410-120-2010 for HRSN Request requirements.
<i>Cross-Cutting: Service Authorization</i>					
8.	Cross-Cutting	Service Authorization	12/6/24	Does the 14-day timeline for authorization begin from the date of receipt of the HRSN request? Is there any flexibility in this timeline?	<p>Yes, the timeline begins upon receipt of the HRSN Request, per OAR 410-120-2020 and 410-141-3935. OHA understands that 14 days for service authorization may not always be feasible, which is why there is a 14 day extension option.</p> <p>However, in response to the demand for HRSN Rent Assistance, OHA has allowed for an additional 14 days (for a total of 42 days from HRSN Request form receipt) until January 31, 2025.</p>
9.	Cross-Cutting	Service Authorization	12/6/24	Are approval letters necessary?	HRSN Service Authorization requirements align with other covered service requirements. Please refer to OAR 410-141-3835 for service authorization and notification requirements.

#	Benefit Area	Topic	Publication Date	Question	Response
<i>Cross-Cutting: Payment</i>					
10.	Cross-Cutting	Payment	12/20/24	The HRSN Fee Schedules note that “A 2% MCO tax load will be added to all payments included in the fee schedule.” Is this 2% going to CCOs or providers?	The MCO tax load only applies to the payments that OHA makes to CCOs to cover the 2% MCO tax that will be collected on CCOs’ HRSN revenue. In other words, OHA must inflate payments to CCOs so that, after tax, they are still reimbursed at 100% of costs (up to UPL). Presently, MMIS is not set up to for HRSN service-based payments to include the 2% MCO tax load. OHA will be creating a process to reimburse CCOs manually. More information is forthcoming on this process.
<i>Cross-Cutting: Billing</i>					
11.	Cross-Cutting	Billing	12/6/24	Would a claim be denied if the service provider uses a date of service other than the 1 st or 2 nd of the month?	No; claims would not be denied based on date of service alone; however, date of service should follow guidance included in the HRSN Billing Guide. The date of service could be up to the 6 th of the month.
12.	Cross-Cutting	Billing	12/6/24	Can we add the service month somewhere on the claim?	Currently, we cannot pull service date anywhere else on the claim. If CCOs have a Loop/Segment they would propose to use, we are open to the future possibility, but it would require a MMIS change request to implement. We weren’t able to identify a usable Loop/Segment.

#	Benefit Area	Topic	Publication Date	Question	Response
<i>Cross-Cutting: PCSP</i>					
13.	Cross-Cutting	PCSP	12/6/24	How frequently should the HRSN Person Centered Service Plan (PCSP) be updated?	As defined in OAR 410-120-0000, the HRSN PCSP must be reviewed and revised upon reassessment of need at least very six months, or more frequently if the Member's circumstance requires.
<i>Cross-Cutting: Service Provider</i>					
14.	Cross-Cutting	Service Provider	12/6/24	How do we manage vendor contracts in terms of encounter data? For CCOs without CBOs to provide services, they will likely contract with vendors who will not be enrolled as HRSN Service Providers.	OHA understands that the CCO will likely be the provider in a lot of areas for encounter data, especially at the beginning.
15.	Cross-Cutting	Service Provider	12/6/24	Do HRSN Service Providers need to carry professional liability insurance? If so, what are the coverage limits?	Yes; HRSN Service Providers need to carry professional liability insurance. OHA does not dictate coverage limits; that is up to the CCO.
16.	Cross-Cutting	Service Provider	12/20/24	Can the HRSN Service Provider requirement to maintain an active business registration in the State be changed in OARs? Alternatively, can CCBF applicant criteria be adjusted to require a business registry number? Can entities without business registry numbers (e.g., a governmental agency) apply for CCBF?	In order to be an HRSN Service Provider, organizations must maintain an active business registration with the State. Because CCBF is available to organizations that may serve in a network manager or 'hub' capacity (and these entities may not have business registry numbers), CCBF applicant criteria will not require a business registry number.

#	Benefit Area	Topic	Publication Date	Question	Response
17.	Cross-Cutting	Service Provider	12/20/24	Can HRSN Service Providers attest that the vendors they procure meet state licensing and CCBF requirements? Or, do CCOs need to collect documentation of vendor qualifications?	As noted in OAR 410-120-1260, all vendors must meet applicable national and state licensure/certification requirements. CCOs have discretion in how they determine that vendors procured by HRSN Providers meet these requirements. CCBF does not outline any requirements for HRSN vendors—rather, it outlines eligibility criteria for organizations that wish to apply for CCBF funding. Self-attestation is accepted for certain CCBF eligibility criteria (e.g., intent to contract with a CCO or OHA Open Card (fee-for-service) Administrator to provide HRSN), while others require documentation (e.g., confirmation of financial stability).
<i>Cross-Cutting: General</i>					
18.	Cross-Cutting	General	12/6/24	Are there guidelines on fraud, waste and abuse as it relates to HRSN?	OHA will look at creating audits and working with staff in OPAR. This will also be discussed in All Plans Systems Technical meetings. OHA will be looking at auditing across CCOs and feedback can be provided to Mary Durrant (mary.durrant@oha.oregon.gov)
19.	Cross-Cutting	General	12/20/24	Are Behavioral Health Resource Network facilities an OHA funded program? Are there restrictions to providing HRSN rent assistance to BHRN facilities?	CCOs should check this Measure 110 tool to determine if the BHR facility is receiving Measure 110 funding. If so, CCOs should reach out to OHA for more information on

#	Benefit Area	Topic	Publication Date	Question	Response
					the grant the facility has received, including restrictions.
<i>Housing: Service Eligibility and Authorization</i>					
20.	Housing	Service Eligibility and Authorization	12/6/24	How is the 30% AMI determined and what documentation is needed?	<p>There must be a good faith effort to provide the annual income, but it is understood that income may change and it is acceptable to use the last two months to approximate Member's income.</p> <p>The State anticipates most Members will not know their income as a % AMI, which is why OHA has provided a chart that helps Members identify their % AMI based on the number of people in their household, income level, and region. Housing providers have expertise in working with an individual to determine if they meet this criterion. Income is gross, and dependent on last two months.</p> <p>For income verification, the options in the order of preference are:</p> <ol style="list-style-type: none"> 1) Third party verification (such as a copy of most recent paystub(s), unemployment statement, worker's compensation, SSI, SSDI, most recent TANF payment statement, or records directly from the income source), OR 2) Written statements by a case manager, social worker, or other

#	Benefit Area	Topic	Publication Date	Question	Response
					<p>authorized staff that are documented and verified by an HRSN connector/intake worker, OR</p> <p>3) Self-attestation.</p> <p>OHA has included language in contract that indicates if CCOs cannot in good faith verify self-attestation within a reasonable period of time, they can authorize services if in their reasonable discretion they believe the attestation is truthful.</p> <p>If a minor is the one who needs the housing, the documentation can be for the parent/head of household. When receiving benefits, the rental agreement and income will be of the guardian(s) but the other criteria will be the child (covered population, social risk factor clinical risk factor). More information can be found in the At-Risk of Homelessness: Housing Income Verification and Documentation Guide on the HRSN Provider webpage.</p>
21.	Housing	Service Eligibility and Authorization	12/6/24	How is the eligibility criterion that a Member “lacks sufficient resources or support network to prevent them from becoming homeless” assessed?	The “lack of sufficient systems/support” is subjective, so the State is allowing for self-attestation (i.e., no additional documentation is needed). In the housing system, this is collected by a case manager talking with the Member about the systems and support they have in place.

#	Benefit Area	Topic	Publication Date	Question	Response
22.	Housing	Service Eligibility and Authorization	12/6/24	Does the Member need to provide all of the following or just one of the following for the rent services: 1. Written lease, 2. Written agreement, 3. HRSN Renter/Landlord verification form?	The Member only needs to provide one of the forms of verification.
23.	Housing	Service Eligibility and Authorization	12/6/24	Does the address on the lease need to match the physical address on the Member's OHP record?	Yes, the address on the lease must match the physical address on the Member's OHP records. If the address does not match, CCOs should take steps to update the Member's address with OHP (PHTech).
24.	Housing	Service Eligibility and Authorization	12/6/24	If a Member is at risk of losing housing, can they get HRSN rent assistance for a new place to live?	HRSN can only be used for a new residence when there is already a rental/lease agreement in place, not for moving costs to a new residence. For moving/relocation costs they would need to go through another program, but once they are established in a new residence HRSN can provide rent assistance.
25.	Housing	Service Eligibility and Authorization	12/6/24	Who is eligible for hotel/motel stays?	Hotel/motel stays are only available to Members who: 1. Are currently housed with a written agreement or lease signed by both the landlord and Member; and, 2. Need support maintaining current housing; and, 3. Meet the At-Risk of Homelessness definition in OAR 410-120- 0000; and,

#	Benefit Area	Topic	Publication Date	Question	Response
					<p>4. Have a Housing Clinical Risk Factor as defined in Table 2 of OAR 410-120-2005; and,</p> <p>5. Are receiving the Home Modifications or Home Remediations service, and cannot safely reside in their home while the Home Modification or Home Remediation Service is conducted.</p> <p>Note: Hotel/motel stays are subject to the 6 month rent assistance maximum. In other words, if someone is already receiving HRSN rent assistance, their hotel/motel stay for home modifications/remediations must be included in the total 6 months available for rent assistance.</p>
26.	Housing	Service Eligibility and Authorization	12/6/24	Are homeowners eligible for hotel/motel stays during home modifications/remediations?	While homeowners are potentially eligible for HRSN home modifications and remediations, they are not eligible for hotel/motel stays during the home modifications and remediations.
27.	Housing	Service Eligibility and Authorization	12/6/24	A Member must be at-risk of homelessness to receive hotel/motel stays, but that is not required for home modifications/remediations. If a Member is not at-risk of	Correct; home modifications/remediations are available for all HRSN covered populations, but hotel/motel stays are only available for those at-risk of homelessness.

#	Benefit Area	Topic	Publication Date	Question	Response
				homelessness, do they need to find an alternate place to stay?	
28.	Housing	Service Eligibility and Authorization	12/6/24	For home modification/remediations, if the Member is a homeowner, do they need to provide verification of home ownership?	Yes; homeowners will need to provide verification of home ownership. See OAR 410-120-2005 Table 4: If the Member owns their home, the Member must provide proof of homeownership (for example, Certificate of Title/Deed).
29.	Housing	Service Eligibility and Authorization	12/6/24	What if the Member disenrolls from OHP while receiving rent assistance?	Member OHP enrollment should be checked each month before issuing a rent payment. The individual would no longer be eligible to receive forward HRSN rent assistance after they are disenrolled from OHP. For forward rent, OHA recommends using the date of service as the first day of the month to avoid enrollment issues mid-month after rent is paid.
30.	Housing	Service Eligibility and Authorization	12/6/24	If a Member is receiving housing subsidies, can HRSN be used to cover the portion of rent the Member is responsible for?	It depends on the funding source. Some forms of assistance cannot be combined with others, but where allowed HRSN can supplement other forms of assistance.
31.	Housing	Service Eligibility and Authorization	12/6/24	Are home modifications and home remediations available for owners and renters?	Yes, home modifications and home remediations are available for owners and renters. OHA will update the guidance document to reflect this.
32.	Housing	Service Eligibility and Authorization	12/6/24	Could a Member request multiple home modifications at once or do they need to send a request for each modification?	A separate request is not necessary as long as eligibility can be confirmed for each item.

#	Benefit Area	Topic	Publication Date	Question	Response
33.	Housing	Service Eligibility and Authorization	12/6/24	What if a Member is authorized for 6-months of rent support and then displaced due to a need for home modifications/remediations? Can CCOs simultaneously pay for rent and hotel/motel stays?	The HRSN rent assistance limitation is by Member household, not by physical address. CCOs can simultaneously use HRSN for rent and hotel/motel stays, so long as the total duration is no longer than six months.
34.	Housing	Service Eligibility and Authorization	12/6/24	Can HRSN tenancy services be provided for a homeowner who may need home modification/remediation?	This is not allowed within the 1115 Waiver Special Terms and Conditions eligibility framework. Providers can use HRSN Outreach and Engagement for this purpose.
35.	Housing	Service Eligibility and Authorization	12/6/24	If a Member is receiving HRSN home modifications, can they receive HRSN storage fees assistance?	If a Member is only receiving a home modification, they cannot receive storage fees assistance. A Member must be receiving HRSN rent assistance to be eligible for HRSN storage fees.
36.	Housing	Service Eligibility and Authorization	12/6/24	Who should consider using HRSN the storage fee service?	Storage fees are for circumstances where, for example, someone is in a doubled-up situation and needs somewhere to store their belongings.
37.	Housing	Service Eligibility and Authorization	12/6/24	How will CCOs know if the Member has already received HRSN rent assistance from another CCO?	CCOs should review the transition of care rules for any transfer and use self-attestation to see if the Member has previously received rent or other HRSN supports that have an authorization limit. OHA is looking into other ways to support visibility into this process.

#	Benefit Area	Topic	Publication Date	Question	Response
38.	Housing	Service Eligibility and Authorization	12/13/24	Would Oregon Paid Leave, unemployment, or disability income constitute income as it relates to their eligibility for HRSN housing services?	This could go under wages or unemployment/disability, but should still be captured as income. Please see the At Risk of Homelessness: Housing Income Verification and Documentation Guide on the HRSN Provider web page: https://www.oregon.gov/oha/HSD/OHP/Tools/HRSN-Income-Guide-EN.pdf
39.	Housing	Service Eligibility and Authorization	12/13/24	A year long lease has expired, and been converted to a month to month lease. However, there is no documentation of the new month to month lease, only the expired lease. Is this documentation acceptable?	Expired leases that have converted to and are now serving as a Member's current month to month lease, as permitted under ORS 90.427 , will suffice as acceptable documentation for the Rent/Utilities service. In the event the rent amount has changed, the Member will need to supply documentation demonstrating the current amount.
40.	Housing	Service Eligibility and Authorization	12/13/24	How should CCOs handle instances where a lease agreement may not have all the required information on the landlord/tenant agreement?	If a Member has a lease, that is sufficient. OHA does not expect CCOs to renegotiate existing leases to include all required information on the landlord/tenant agreement. The "required components" noted in OAR for the landlord/tenant agreement are only required if the Member does not have a lease and is developing alternative documentation of their current living arrangement. Refer to OAR 410-120-2005 Table 4 for additional information.

#	Benefit Area	Topic	Publication Date	Question	Response
41.	Housing	Service Eligibility and Authorization	12/13/24	How can Members who have had a recent change in income that is not accurately reflected in their recent tax return or other income documentation show proof of income?	The Member may use self-attestation to document their income. Please see the At-Risk of Homelessness: Housing Income Verification and Documentation Guide for more information.
42.	Housing	Service Eligibility and Authorization	12/20/24	If a Member needs two months of rent, and then later they need rent assistance again, can they apply?	No. The 6 months of utilities and rent must be consecutive months. Per OAR 410-120-2005, HRSN rent assistance can be authorized once per household over the duration of the waiver.
43.	Housing	Service Eligibility and Authorization	12/20/24	Is student housing an appropriate setting for HRSN rent?	Yes, OHP members living in student housing may be eligible for HRSN rent, as long as they meet all components of the HRSN rent eligibility criteria, per OAR 410-120-2005. As part of determining the member's income, CCOs should review any aid from FAFSA and student loans and determine the amount of aid that is in excess of tuition. Per 24 CFR 5.609(b)(9) , the excess amount will be considered income except in cases where the student is a minor or a full-time student that is not the head of household. Household assets should also be considered in determining income. In addition to being eligible based on income, the student would also need to self-attest to lacking resources or systems of care to prevent homelessness.

#	Benefit Area	Topic	Publication Date	Question	Response
<i>Housing: Service Design – Rent/Utilities</i>					
44.	Housing	Service Design: Rent/Utilities	12/6/24	Are arrears that were accrued prior to go live eligible to be covered under HRSN rent/utilities? Or arrears accrued when the Member was with a different CCO?	Yes; if a Member is currently eligible for HRSN rent assistance, the Member can receive up to 6 months of HRSN rent assistance, including arrears for months prior to the benefit go live. It is the responsibility of the current health plan authorizing HRSN rent assistance to cover the eligible arrears costs.
45.	Housing	Service Design: Rent/Utilities	12/6/24	Are arrears covered if they were accrued when the Member was not on OHP?	Yes, if a Member is currently eligible for HRSN rent/utilities, the Member can receive up to 6 months of HRSN rent/utilities, including arrears for months prior to their OHP enrollment. The date of service should reflect the month that the Member receives the service, and the day after the 1 st from most recent to least recent. Please refer to the HRSN Billing Guide for additional information.
46.	Housing	Service Design: Rent/Utilities	12/6/24	Can CCOs pay arrears if they have been sent to collections?	HRSN rent and utilities arrears should not be used to cover arrears that have been sent to collections.
47.	Housing	Service Design: Rent/Utilities	12/6/24	How are HRSN rent and utility arrears combined with forward rent and utility payments?	Guidelines for combining Rent and Utilities: <ul style="list-style-type: none"> • A Member may not receive more than 6 months of rent and 6 months of utilities.

#	Benefit Area	Topic	Publication Date	Question	Response
					<ul style="list-style-type: none"> • To receive HRSN utilities, a Member must be receiving HRSN rent. • A Member may not receive more months of HRSN utilities than they receive of HRSN rent. • A Member may not receive HRSN utilities going forward if they are not receiving HRSN rent going forward.
48.	Housing	Service Design: Rent/Utilities	12/6/24	Are HRSN utility payments only allowed for those tied to the rent ledger?	No. Utilities that are separate from the rent payment are reimbursable through the HRSN program, as well as utilities that are bundled with rent. The Member must be receiving the HRSN rent payment to be eligible for utilities payments. A comprehensive list of eligible utility payments is available in the OAR 410-120-2005 Table 4.
49.	Housing	Service Design: Rent/Utilities	12/6/24	How do CCOs distinguish between 1) utilities on a rent ledger and 2) standalone utilities directly from a vendor?	Please refer to the HRSN Billing Guide.
50.	Housing	Service Design: Rent/Utilities	12/13/24	How are utilities set up and utilities arrears differentiated?	The procedure code for utilities set up is different than the procedure code for utilities arrears. Utilities set up has a modifier, but the utilities arrears do not.
51.	Housing	Service Design: Rent/Utilities	12/6/24	For manufactured homes and RV parks, a Member may have a rental agreement for the land, and a	HRSN rent payments may be used for the rental agreement, but they may not be used for the mortgage payment. The

#	Benefit Area	Topic	Publication Date	Question	Response
				mortgage payment for the home/RV. Can the rental assistance and utilities be used for this?	Member may receive HRSN utilities assistance if they are receiving HRSN rent assistance.
52.	Housing	Service Design: Rent/Utilities	12/13/24	Does the address for the rental assistance need to be the same for the full 6 months? If they move, would they lose the benefit?	Yes; it needs to be the same address.
53.	Housing	Service Design: Rent/Utilities	12/13/24	Does the phone utilities benefit cover just the Member, or other lines on their plan? If it does cover other lines, is it correct to assume this would not extend to a business line? Does the phone utilities benefit cover just the line costs, or does it also cover device costs (e.g. Phone, hotspots)?	Business lines, hotspots, insurance, and cost of the devices are not covered under HRSN. The benefit includes all lines included in the plan, provided that the address on the cell phone plan matches the Member's address, subject to the UPL.
54.	Housing	Service Design: Rent/Utilities	12/13/24	Do utilities set up count against the 6 months?	Under the utilities set up service, the payment for the first month of the utility payment does count toward a Member's total allowable six months of utility payments. A Member may not receive more than six months of utility support through HRSN Housing Supports.
55.	Housing	Service Design: Rent/Utilities	12/20/24	Are late fees that were incurred as part of past-due rent covered as part of rent arrears?	Yes, as detailed in Table 4 of the attachment in OAR 410-120-2005, HRSN rent covers the cost of recurring rent, to include past-due rent and any associated late fees as a result of past-due rent.

#	Benefit Area	Topic	Publication Date	Question	Response
56.	Housing	Service Design: Rent/Utilities	12/20/24	Can rent be used to pay for the cost of breaking a lease?	No, as detailed in Table 4 of the attachment in OAR 410-120-2005, rent cannot cover the cost of breaking a lease.
57.	Housing	Service Design: Rent/Utilities	12/20/24	Does OHA have a specific vision or guidance for authorizations that include variable utilities?	CCOs should authorize the UPL for utilities for up to six months and review the utility bills as they are submitted in claims.
<i>Housing: Service Design – Hotel/Motel</i>					
58.	Housing	Service Design: Hotel/Motel	12/6/24	Are AirBnBs allowed for HRSN hotel/motel stays?	No; hotel/motel stays are limited commercially zoned hotels and motels.
<i>Housing: Service Design – Home Modifications and Remediations</i>					
59.	Housing	Service Design: Home Remediation	12/6/24	Is mold remediation covered?	No, mold remediation is not covered under the HRSN program.
60.	Housing	Service Design: Home Modifications and Remediations	12/6/24	Are there recommended specifications for Home Modifications and Remediations?	<p>The following specifications will be added in CCO Guidance for ramps:</p> <ul style="list-style-type: none"> • Must conform to ADA requirements (1:12) or if necessary due to space constraints and with consumer approval 1:10 • Must have non-slip surface • Must have handrails, even if the consumer doesn't choose this • Is preferred to be a metal ramp <p>Pest eradication may include sealing areas where pests can enter or hide, or other activities identified as best practices for pest control and eradication.</p>

#	Benefit Area	Topic	Publication Date	Question	Response
61.	Housing	Service Design: Home Modifications and Remediations	12/13/24	How should we bill for the work to deliver home mods and remediations?	<p>HRSN Tenancy Services may be used for Members who are eligible (note that eligibility for HRSN Tenancy Services is the same for HRSN Rent Assistance. See OAR 410-120-2005, Table 5).</p> <p>O&E may be used to assist a Member in coordinating the delivery of home modifications and remediations for Members who are not eligible for Tenancy Services, including homeowners.</p>
62.	Housing	Service Design: Home Modifications and Remediations	12/13/24	Can a vendor charge for mileage within the bid for a home remediation or modification?	Vendors may include the cost of transport within their bid for a home modification or remediation. Oftentimes, the cost of transport is rolled into the overall cost of the project. The cost of the project may not exceed the UPL.
<i>Housing: Payment</i>					
63.	Housing	Payment	12/6/24	Can HRSN service providers include the cost of credit card fees in their invoices to CCOs when paying for housing benefits through credit card (e.g., utilities storage)?	OHA leaves the form of payment to the discretion of the provider. Credit card fees cannot be included in the cost of the service.
64.	Housing	Payment	12/6/24	Can CCOs pay the first month of rent under HRS flex and then authorize under HRSN for the remaining 5 months to another housing provider? Does it matter if	If the individual is eligible for HRSN rent assistance, HRS flex cannot be used to cover the rent; however, if HRS flex is used to pay for rent prior to the launch of the HRSN program/Member's eligibility, HRSN can be used moving forward once the

#	Benefit Area	Topic	Publication Date	Question	Response
				the service is being provided by multiple service providers?	Member is determined eligible. There should be no problem in changing the source of payment. The months where the Member received rent assistance through HRS flex (prior to becoming eligible/prior to program launch) do not count toward the 6 month HRSN rent assistance limit. Housing providers do not need to provide all housing services, so either CCO or housing provider can provide rent payment, tenancy services, etc.
65.	Housing	Payment	12/6/24	Is the variable administrative fee only for providing the Member the first month of rent, but not for providing the consecutive five months of rent?	Yes; the housing variable admin. is payable associated with claims for the first month of rent and utility costs, once for home modifications, and once for home remediations.
66.	Housing	Payment	12/6/24	Will CCOs be reimbursed for funds spent assisting a Member in preventing imminent eviction even though CCOs are not required to do so?	Yes; as long as the individual receiving the services is eligible and authorized for HRSN services, the CCO can get reimbursed. However, HRSN Outreach and Engagement and Tenancy Services performed by the CCO are included in the CCO Administrative Payments.
67.	Housing	Payment	12/20/24	What information is available about the Tenancy Services that can be billed on a PMPM basis?	The PMPM option is a second reimbursement option for Tenancy Services, the current option for reimbursement is 'per 15 minutes'. This option will be available in January 2025.

#	Benefit Area	Topic	Publication Date	Question	Response
68.	Housing	Payment	12/20/24	How can CCOs ensure timely payment of rent?	CCOs may use a date during the last week of the prior month that rent is due to ensure the landlord receives the rent payment on, or before, the date it is due. OHA will update the HRSN Billing Guide with this information.
<i>Housing: Claims/Billing</i>					
69.	Housing	Claims/ Billing	12/6/24	Will CCOs need to differentiate labor/materials in documenting costs for home remediations?	No; that level of information is not needed for encounter claims.
70.	Housing	Claims/ Billing	12/6/24	Should there be a separate claim for each utility bill?	Yes; if the CCO pays each utility separately, there should be a corresponding individual encounter claim representing each payment.
71.	Housing	Claims/ Billing	12/6/24	If a Member has multiple bills due across different dates, what date range should be used for authorization?	OHA would prefer to have the information on the specific bills. The dates we are recommending for date of service would be the beginning date of the service date. If the bill is for 10/1-10/31, the date of service is 10/1. If the bill is for 10/4-11/3, the date of service is 10/4. If the bill is for 10/14-11/13, the date of service is 10/14. If the bill is for 10/4-12/3, this would represent two claims, the first date of service would be 10/4 and the second would be 11/4, etc.
72.	Housing	Claims/ Billing	12/6/24	What if a Member has one bill that spans across multiple months?	Refer to the HRSN Billing Guide for more information. This bill would need to be separated into multiple claims, one claim

#	Benefit Area	Topic	Publication Date	Question	Response
					per month. All bills should have an attributable amount and should be approved/encountered accordingly.
73.	Housing	Claims/ Billing	12/6/24	Does a bill that has a past due and an overdue balance count as one claim?	This should be further clarified with the Member to better understand the past due and overdue amounts. If they are expenses for different months, then that would not be one claim.
74.	Housing	Claims/ Billing	12/13/24	Will there be an additional modifier for the utility arrears to distinguish by region?	Utilities Arrears does not have additional modifiers beyond the U1 modifier required for all HRSN services.
75.	Housing	Claims/ Billing	12/13/24	Should utilities be billed using the first of the month, without date ranges?	For utilities that are not bundled with forward rent: Use the first day within the service period.
76.	Housing	Claims/ Billing	12/13/24	Could there be a situation where the dates of service overlap, for example, might rent have date of service for 11/2 and utilities have date of service for 11/2?	Yes, this may occur in a situation where rent/utilities are separate and the DOS could be the same.
77.	Housing	Claims/ Billing	12/13/24	What date of service should be used for forward rent payments?	For forward rent assistance (i.e., rent assistance that is paid at the beginning of the month for the month ahead): use the first day of the month that the rent is for.
78.	Housing	Claims/ Billing	12/13/24	Do HRSN providers need to decipher the difference between housing units when they submit claims?	The CCO is responsible for ensuring the payment adheres to the upper payment limit for the region and number of bedrooms per unit.
79.	Housing	Claims/ Billing	12/13/24	Future rent and rent arrears use the same procedure code. How will	The fee schedule and procedure codes are intended to align with the housing service

#	Benefit Area	Topic	Publication Date	Question	Response
				CCOs know if they should approve utilities based on the rent?	definitions. HRSN service providers and the Member's CCO will need to determine billing details for all invoices. Utilities arrears has its own procedure code, an invoice for past due utilities should be billed using that procedure code. Invoices for past due rent should be billed through the rent procedure code. CCOs will be responsible for tracking service limits for Members.
80.	Housing	Claims/ Billing	12/13/24	Is the CCO the provider on the claims for variable admin? Is OHA still expecting enrollment of the provider as atypical if an HRSN provider is enrolled as a clinical provider with an NPI? Or do they still use their NPI for both? Do you want them to bill with the separate IDs?	The two provider types that are allowed on regular HRSN claims are the CCO itself or the new Type 68 HRSN Provider Type. The Type 68 may or may not have an NPI. For Variable Admin, the only provider on the claim should be the CCO itself as the billing provider with no separate rendering provider included. The CCO will not have an NPI and will be sent as an Atypical provider.
<i>Housing: Service Providers</i>					
81.	Housing	Service Provider	12/6/24	Will a CCO be penalized for serving as the housing provider at 11/1 go live? What guidance does OHA have for network adequacy and mitigating conflict of interest for 11/1 and throughout the course of the demonstration?	OHA understands not all providers will be ready to go live with HRSN housing services on 11/1. In the case that only the CCO has capacity to provide housing services on 11/1, they must demonstrate they are the only willing and capable provider available to furnish services.

#	Benefit Area	Topic	Publication Date	Question	Response
					OHA expects additional providers to be added to the CCO network and conflict of interest processes to be implemented throughout the course of the Demonstration. CCOs must confirm plans to meet network adequacy requirements in housing readiness plans. OHA will be available to provide TA to CCOs on conflict-of-interest processes in 1:1 sessions.
82.	Housing	Service Providers	12/6/24	For HRSN tenancy services, what are the documents that the service provider needs to maintain?	<p>The HRSN PCSP is maintained by the CCO and we encourage HRSN service providers to provide information for the HRSN PCSP. CCOs set standards for provider documentation in their network contracting.</p> <p>For record-keeping, OHA recommends providers maintain documentation similar to what is expected for O&E services.</p>
<i>Outreach and Engagement: Service Providers</i>					
83.	Outreach and Engagement	Service Provider	12/6/24	Can HRSN outreach and engagement services be furnished by the HRSN Service Provider and/or by the CCO?	Yes; however, payment for HRSN O&E activities performed by the CCO are included in the CCO HRSN Administrative Payments.
<i>Outreach and Engagement: Billing</i>					
84.	Outreach and Engagement	Billing	12/20/24	Should a default outreach and engagement diagnosis code be used for generating O&E claims? Is a short list of diagnosis codes be	CCOs are obliged to use best practices for billing HRSN O&E services. However, recognizing the challenge in applying best billing practices for the HRSN benefit,

#	Benefit Area	Topic	Publication Date	Question	Response
				available for outreach and engagement providers to select from as appropriate?	particularly due to the low barrier access nature to O&E services, OHA has provided guidance that z-codes, and particularly Z55-Z65: persons with potential health hazards related to socioeconomic and psychosocial circumstances, may be the most appropriate diagnosis code when there is no self-attestation, claims data, or clinical report of a current medical condition.
<i>CCBF</i>					
85.	CCBF	Funds Use	12/13/24	Since credit card fees (for making online utilities/rent payments) are not allowed, can CCBF be used for those?	No, CCBF cannot be used for these payments.

Appendix: Example Rent and Utility Scenarios of HRSN Housing Supports

November 2024

This document provides a sampling of scenarios where different combinations of rent and utilities could be provided under HRSN Housing-Related Supports. The scenarios assume a Member is eligible for the HRSN Services ([Housing Eligibility Guide](#) for additional detail).

According to OAR 410-120-2005:

- To receive HRSN utilities (including forward utilities, arrears, and set up fees), a Member must be receiving HRSN rent.
- Payment may be for past due rent up to six (6) months, or future rent for up to six (6) months, or some combination of past due and future rent not to exceed a total of six (6) months.
- Forward utilities cannot exceed forward rent. Forward rent can be authorized without utilities. In other words, forward (recurring) rent and utilities payments should have the same duration, or utilities should have a shorter duration.
- Scenarios where the utilities have a shorter duration include 1) utilities arrears were paid; or 2) utilities support is not needed.
- In the case that the rent payment includes utilities (in other words, utilities are not provided as a separate line item on the lease or rent bill), consider this payment as rent only.

Member Scenario	HRSN Services for Consideration
<ul style="list-style-type: none"> • Owes 2 months of utilities in arrears, and • Needs support on rent and utilities going forward 	HRSN can either cover: <ul style="list-style-type: none"> ✓ 2 months of utilities in arrears and 4 months of utilities going forward, and 6 months of rent going forward, or ✓ 6 months of utilities going forward and no utility arrears, and 6 months of rent going forward ✓ The HRSN Service Provider should work with the Member to determine what would be the best fit.
<ul style="list-style-type: none"> • Owes 8 months of utilities in arrears; and, • Need support on rent going forward. 	✓ HRSN can cover up to 6 months of utility arrears payment, and ✓ HRSN can cover up to 6 months of rent going forward
<ul style="list-style-type: none"> • Owes 6 months of rent in arrears; and, • Needs support on utilities going forward. 	✓ HRSN can cover up to 6 months of rent arrears payment X HRSN cannot cover the utilities going forward because the Member is not concurrently receiving rent going forward.
<ul style="list-style-type: none"> • Owes 3 months of utilities that are paid for separately from rent (for example, internet) in arrears, and • Needs support on rent and utilities (paid together with rent as a bundled payment, such as sewage) going forward, and 	✓ HRSN can cover up to 3 months of utilities (unbundled from rent) in arrears and up to 3 months of utilities (unbundled from rent) going forward, and

<ul style="list-style-type: none"> Needs support on utilities (paid separately from rent, like internet) going forward. 	✓ HRSN can cover up to 6 months of rent and any bundled utilities (because it is a bundled payment) going forward
<ul style="list-style-type: none"> Needs support setting up utilities and no additional supports 	X If the Member is not receiving rent, the Member is not eligible for the HRSN Utility Set Up service
<i>Storage Fees</i>	
<ul style="list-style-type: none"> Needs support paying for a storage locker and no additional supports 	X If the Member is not receiving rent, the Member is not eligible for the HRSN Storage Fees service
<ul style="list-style-type: none"> Needs support with 6 months of rent going forward; and, Needs support with 6 months of utility payments going forward; and, Needs support with 6 months of paying for a storage locker 	<ul style="list-style-type: none"> ✓ HRSN can cover up to 6 months of rent going forward ✓ HRSN can cover up to 6 months of utility payments going forward ✓ HRSN can cover 6 months of payment for the storage locker going forward, because the Member is concurrently receiving 6 months of rent going forward