



## 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.

This document reflects questions that were received on or before **Nov 21, 2024**.

***Current as of: December 6, 2024***

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#	Benefit Area	Topic	Question	Response
<i>Cross-Cutting: Eligibility</i>				
1.	Cross-Cutting	Eligibility	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	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).
<i>Cross-Cutting: HRSN Requests</i>				
3.	Cross-Cutting	HRSN Requests	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?	<p>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:</p> <ol style="list-style-type: none"> <li>1. Name of Member and Contact information</li> <li>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)</li> <li>3. A Statement that the individual wants to participate in the HRSN Eligibility Screening</li> </ol> <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).</p>

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				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.
4.	Cross-Cutting	HRSN Requests	If an HRSN Request comes in without all of the necessary 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>Please refer to OAR 410-120-2010 for HRSN Request requirements. An 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>
5.	Cross-Cutting	HRSN Requests	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

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				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 receive the service through HRS/Flex, if applicable.
6.	Cross-Cutting	HRSN Requests	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>				
7.	Cross-Cutting	Service Authorization	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>
8.	Cross-Cutting	Service Authorization	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.

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<i>Cross-Cutting: Billing</i>				
9.	Cross-Cutting	Billing	Would a claim be denied if the service provider uses a date of service other than the 1 <sup>st</sup> or 2 <sup>nd</sup> 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 <sup>th</sup> of the month.
10.	Cross-Cutting	Billing	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.
<i>Cross-Cutting: PCSP</i>				
11.	Cross-Cutting	PCSP	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>				
12.	Cross-Cutting	Service Provider	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.
13.	Cross-Cutting	Service Provider	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.

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<i>Cross-Cutting: General</i>				
14.	Cross-Cutting	General	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)
<i>Housing: Service Eligibility and Authorization</i>				
15.	Housing	Service Eligibility and Authorization	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. 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"> <li>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</li> </ol>

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				<p>2) Written statements by a case manager, social worker, or other 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 <a href="#">At-Risk of Homelessness: Housing Income Verification and Documentation Guide</a> on the <a href="#">HRSN Provider webpage</a>.</p>
16.	Housing	Service Eligibility and Authorization	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.
17.	Housing	Service Eligibility and Authorization	Does the member need to provide all of the following or just one of the following for the rent services: 1.	The Member only needs to provide one of the forms of verification.

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			Written lease, 2. Written agreement, 3. HRSN Renter/Landlord verification form?	
18.	Housing	Service Eligibility and Authorization	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).
19.	Housing	Service Eligibility and Authorization	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.
20.	Housing	Service Eligibility and Authorization	Who is eligible for hotel/motel stays?	Hotel/motel stays are only available to Members who: <ul style="list-style-type: none"> <li>1. Are currently housed with a written agreement or lease signed by both the landlord and Member; and,</li> <li>2. Need support maintaining current housing; and,</li> <li>3. Meet the At-Risk of Homelessness definition in OAR 410-120- 0000; and,</li> <li>4. Have a Housing Clinical Risk Factor as defined in Table 2 of OAR 410-120-2005; and,</li> <li>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.</li> </ul>



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				<b>Note:</b> 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.
21.	Housing	Service Eligibility and Authorization	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.
22.	Housing	Service Eligibility and Authorization	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 homelessness, do they need to find an alternate place to stay?	Correct; home modifications/remediations are available for all HRSN covered populations, but hotel/motel stays are only available for those at-risk of homelessness.
23.	Housing	Service Eligibility and Authorization	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).
24.	Housing	Service Eligibility and Authorization	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

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				day of the month to avoid enrollment issues mid-month after rent is paid.
25.	Housing	Service Eligibility and Authorization	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.
26.	Housing	Service Eligibility and Authorization	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.
27.	Housing	Service Eligibility and Authorization	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.
28.	Housing	Service Eligibility and Authorization	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.
29.	Housing	Service Eligibility and Authorization	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.
30.	Housing	Service Eligibility and Authorization	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.

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31.	Housing	Service Eligibility and Authorization	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.
32.	Housing	Service Eligibility and Authorization	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.
<i>Housing: Service Design – Rent/Utilities</i>				
33.	Housing	Service Design: Rent/Utilities	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.
34.	Housing	Service Design: Rent/Utilities	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 <sup>st</sup> from most recent to least recent. Please refer to the HRSN Billing Guide for additional information.

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35.	Housing	Service Design: Rent/Utilities	Can CCOs pay arrears if they have been sent to collections?	<i>[Response in process]</i>
36.	Housing	Service Design: Rent/Utilities	How are HRSN rent and utility arrears combined with forward rent and utility payments?	<p>Guidelines for combining Rent and Utilities:</p> <ul style="list-style-type: none"> <li>• A member may not receive more than 6 months of rent and 6 months of utilities.</li> <li>• To receive HRSN utilities, a Member must be receiving HRSN rent.</li> <li>• A member may not receive more months of HRSN utilities than they receive of HRSN rent.</li> <li>• A member may not receive HRSN utilities going forward if they are not receiving HRSN rent going forward.</li> </ul>
37.	Housing	Service Design: Rent/Utilities	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.
38.	Housing	Service Design: Rent/Utilities	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.
39.	Housing	Service Design: Rent/Utilities	How are utilities set up and utilities arrears differentiated?	Utilities set up has a modifier, but the utilities arrears does not.

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40.	Housing	Service Design: Rent/Utilities	For manufactured homes and RV parks, a Member may have a rental agreement for the land, and a mortgage payment for the home/RV. Can the rental assistance and utilities be used for this?	HRSN rent payments may be used for the rental agreement, but they may not be used for the mortgage payment. The Member may receive HRSN utilities assistance if they are receiving HRSN rent assistance.
<i>Housing: Service Design – Hotel/Motel</i>				
41.	Housing	Service Design: Hotel/Motel	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>				
42.	Housing	Service Design: Home Remediation	Is mold remediation covered?	No, mold remediation is not covered under the HRSN program.
43.	Housing	Service Design: Home Modifications and Remediations	Are there recommended specifications for Home Modifications and Remediations?	<i>[Response in process]</i>
<i>Housing: Payment</i>				
44.	Housing	Payment	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.
45.	Housing	Payment	Can CCOs pay the first month of rent under HRS flex and then authorize under HRSN for the remaining 5	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

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			months to another housing provider? Does it matter if the service is being provided by multiple service providers?	<p>the launch of the HRSN program/Member's eligibility, HRSN can be used moving forward once the 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.</p> <p>Housing providers do not need to provide all housing services, so either CCO or housing provider can provide rent payment, tenancy services, etc.</p>
46.	Housing	Payment	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.
47.	Housing	Payment	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.
<i>Housing: Claims/Billing</i>				
48.	Housing	Claims/Billing	Will CCOs need to differentiate labor/materials in documenting costs for home remediations?	No; that level of information is not needed for encounter claims.

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49.	Housing	Claims/Billing	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.
50.	Housing	Claims/Billing	If a Member has multiple bills due across different dates, what date range should be used for authorization?	<i>[Response in process]</i>
51.	Housing	Claims/Billing	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 per month. All bills should have an attributable amount and should be approved/encountered accordingly.
52.	Housing	Claims/Billing	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.
<i>Housing: Service Providers</i>				
53.	Housing	Service Provider	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?	<p>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.</p> <p>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</p>

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				TA to CCOs on conflict-of-interest processes in 1:1 sessions.
54.	Housing	Service Providers	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&amp;E services.</p>
<i>Outreach and Engagement: Service Providers</i>				
55.	Outreach and Engagement	Service Provider	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.