



# BHSA HOUSING INTERVENTIONS POLICY AND IMPLEMENTATION

Frequently Asked Questions (FAQs)

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## Introduction

**This document provides responses to frequently asked questions (FAQs) about BHSA Housing Interventions policy and implementation. The FAQ is organized into two sections:**

- » **Section 1:** Behavioral Health Services Act Housing Interventions & Medi-Cal Community Supports
- » **Section 2:** Guidance for Integrating Medi-Cal in the Transition from MHSA and BHBH to Behavioral Health Services Act

**The FAQ are primarily aimed at county behavioral health agencies and may be helpful for MCPs, housing providers, and other stakeholders.**

The Behavioral Health Services Act (BHSA), which goes into effect on July 1, 2026, replaces the Mental Health Services Act (MHSA) of 2004. It reforms behavioral health care funding to prioritize services for people living with the most significant mental health needs, while adding the treatment of substance use disorders (SUD), expanding housing interventions, and increasing the behavioral health workforce. It also enhances oversight, transparency, and accountability at the state and local levels.

County behavioral health agencies will be required to spend thirty percent of their annual allocated BHSA funding on Housing Interventions (see California Welfare & Institutions (W&I) Code section 5892, subdivision (a)(1)(A)). BHSA Housing Interventions will address the housing needs of BHSA eligible individuals experiencing or at risk of homelessness through the provision of rental assistance, interim housing, operating subsidies, capital development funding for affordable and supportive housing, and other housing interventions. BHSA allowable expenses are identified in [Section 7.C.9.2](#) of the BHSA Policy Manual.

Many individuals who are eligible to receive BHSA Housing Interventions will also be eligible to receive housing services and supports from their Medi-Cal Managed Care Plan (MCP). These Medi-Cal services, referred to in this FAQ as “Housing-Related Community Supports,” include Housing Transition Navigation Services, Housing Tenancy and Sustaining Services, Housing Deposits, Recuperative Care (Medical Respite), Short-Term Post-Hospitalization Housing, and Transitional Rent. MCPs may also cover housing supports in addition to those listed here, such as Day Habilitation and Environmental Accessibility Adaptations (Home Modifications). A full list of the Community Supports that MCPs may cover is available [here](#).

County behavioral health agencies and MCPs will be expected to work together to effectively braid and sequence the Housing-Related Community Supports and BHSA Housing Interventions. Please note, since Community Supports are available only within the Managed Care delivery system, the information regarding Housing-Related Community Supports in this FAQ applies only to Medi-Cal Members enrolled in an MCP.

The BHSA works in concert with a host of other behavioral health initiatives that have launched in recent years to bolster existing projects and provide counties with additional federal funding opportunities and support from other payers, including the [California Advancing and Innovating Medi-Cal \(CalAIM\) initiative](#), [Behavioral Health Community-Based Organized Networks of Equitable Care and Treatment \(BH-CONNECT\) initiative](#), [Children and Youth Behavioral Health Initiative](#), [Contingency Management](#), [Mobile Crisis](#), and more.

For more information on BHSA Housing Interventions and Housing-Related Community Supports please refer to:

- » [BHSA Policy Manual Section 7.C. Housing Interventions](#)
- » [Community Supports Policy Guide Volume 2](#)

# Section 1: Behavioral Health Services Act Housing Interventions & Medi-Cal Community Supports

This section of the FAQ is organized as follows:

- » **Introduction:** Compliance with California Welfare & Institutions (W&I) Code section 5830, subdivision (c)(2).
- » **Part I:** Background on Housing-Related Community Supports.
- » **Part II:** Considerations for County Behavioral Health Agencies as Providers of Housing-Related Community Supports.
- » **Part III:** Considerations for County Behavioral Health Agencies as Funders of BHSA Housing Interventions.
- » **Part IV:** County Behavioral Health Agencies' Role in Transitional Rent Eligibility and Authorization.

## Introduction: Compliance with California Welfare & Institutions (W&I) Code section 5830, subdivision (c)(2)

1. **W&I Code section 5830, which is part of California law associated with the provision of mental health services including the BHSA, subdivision (c)(2) provides that BHSA Housing Interventions “shall not be used for housing interventions covered by a Medi-Cal managed care plan.” What does this mean?**

This means that county behavioral health agencies may not use BHSA Housing Interventions to fund Housing-Related Community Supports for a Medi-Cal Member who is **eligible to receive the same service** through their MCP. BHSA Housing Interventions **can** fund additional services that are not covered by Medi-Cal and may be provided concurrently to a Medi-Cal Member who is receiving services from their MCP.

County behavioral health agencies are expected to work with their local MCPs to appropriately sequence and coordinate service delivery of BHSA Housing Interventions and Housing-Related Community Supports. Additional information about coverage under BHSA Housing Interventions for Medi-Cal Members eligible to receive Housing-Related Community Supports in different scenarios is provided in this FAQ.

## **Part I: Background on Housing-Related Community Supports**

### **1. Are MCPs required to cover the Housing-Related Community Supports?**

All MCPs are required to cover Transitional Rent for the Behavioral Health Population of Focus (POF) beginning January 1, 2026 (see additional details in Section 1, Part I, Question 3). The Behavioral Health POF definition can be found in the [Community Supports Policy Guide Volume 2](#).

MCP coverage of Housing Transition Navigation Services, Housing Deposits, Housing Tenancy and Sustaining Services, Recuperative Care (Medical Respite), and Short-Term Post-Hospitalization Housing is strongly encouraged. Despite being optional, nearly all MCPs cover the full set of Housing-Related Community Supports. A complete list of MCPs in each county and the Community Supports they currently cover is available [on the DHCS website](#).

### **2. Are the same expenses covered by Transitional Rent and BHSA Housing Interventions?**

Transitional Rent may be used to cover the following expenses (see the [Community Supports Policy Guide Volume 2](#)):

- » Rental assistance, inclusive of storage fees, amenity fees, and landlord-paid utilities that are charged as part of the rent payment.

All of these expenses can also be covered by county behavioral health agencies under BHSA Housing Interventions for those who qualify.

Through Transitional Rent, a Medi-Cal Member can receive up to six months of rental assistance per household per demonstration (current demonstration period ends December 31, 2029). Recipients of Transitional Rent are likely to require longer-term rental assistance and may be transitioned to other rental assistance after receiving Transitional Rent.

County behavioral health agencies are strongly encouraged to work with MCPs to transition Medi-Cal Members from Transitional Rent to long-term rental assistance funded by BHSA Housing Interventions or other sources of funding (e.g., HUD Housing Choice Vouchers).

### **3. Will all Medi-Cal Members who meet the eligibility criteria for Transitional Rent also meet the eligibility criteria for BHSA Housing Interventions?**

No, but DHCS does expect that most Medi-Cal Members who fall into the **Behavioral Health POF** for Transitional Rent will also meet the eligibility criteria for BHSA Housing Interventions, which is the Transitional Rent POF that went live on January 1, 2026. There is a very small population that will fall into the Transitional Rent Behavioral Health POF but may not meet the BHSA eligibility criteria or be covered for BHSA Housing Interventions in a particular county. This is because an individual with a mild SUD will meet the clinical criteria for inclusion in the Behavioral Health POF, and thus could be included in this POF if the other eligibility requirements were met, but may not be eligible for BHSA services. Under the BHSA, eligibility on the basis of an SUD is limited to those with a moderate to severe SUD (see W&I Code section 5830(a)(1), 5892, subdivision (k)(7), and W&I Code section 5891.5, subdivision (c)). In addition, counties have the option but are not required to provide Housing Interventions to an individual with an SUD only (see W&I Code section 5891.5, subdivision (a)(2)).

MCPs may elect to cover POF other than the Behavioral Health POF when Transitional Rent goes live in January 2026 or at a later date. Medi-Cal Members who are included in these POFs, but not the Behavioral Health POF, would not be eligible for BHSA Housing Interventions. A detailed description of the eligibility criteria for Transitional Rent and the Behavioral Health POF is provided in the Community Supports Policy Guide Volume 2. DHCS understands that while there is significant overlap in eligible populations, BHSA Housing Interventions funding may not be sufficient over time to provide ongoing rental assistance to every individual included in the Behavioral Health POF who is served by Transitional Rent.

### **4. Can Transitional Rent be used for eviction prevention for housed Medi-Cal Members at risk of homelessness? If not, in what way does Transitional Rent serve those at risk of homelessness? (Added December 2025)**

Please refer to Section VII. Transitional Rent of the [Community Supports Policy Guide Volume 2](#). At this time, Transitional Rent may **not** be used to cover eviction prevention for Medi-Cal Members who meet the definition of “at risk of homelessness” but are housed. Specifically, Transitional Rent may not be deployed to cover rental arrears (back rent). This means that county behavioral health agencies will need to identify another funding source to cover eviction prevention services for Medi-Cal Members who are housed but at risk of homelessness. One option could be under BHSA funding.

However, there are other Medi-Cal Members who meet the definition of “at risk of homelessness” who **may** qualify for Transitional Rent, for example Medi-Cal Members exiting a publicly funded institution or system of care. Given these Medi-Cal Members are eligible to receive Transitional Rent, they are subject to the rules outlined in W&I Code Section 5830(c)(2).

**5. If a Medi-Cal Member was considered chronically homeless before receiving Transitional Rent, would they still be considered chronically homeless for the purposes of BHSA Housing Interventions even though they were housed by Transitional Rent? (Added December 2025)**

Yes, any Medi-Cal Member who was chronically homeless when housed under Transitional Rent, and who was transferred from Transitional Rent to BHSA, will be considered chronically homeless for purposes of the requirement to direct 50 percent of BHSA Housing Interventions to individuals who are chronically homeless.

**6. Which Housing-Related Community Supports have service duration limits?**

Several Housing-Related Community Supports are subject to the following federally-defined service duration limits.

- » **Global Room and Board Cap:** The Housing-Related Community Supports that provide room and board are subject to a cumulative total limit of six months per rolling 12-month period (as outlined in the CalAIM and BH-CONNECT Section 1115 waivers), referred to as the “Global Room and Board Cap.” These specific Community Supports services are: Transitional Rent, Recuperative Care, and Short-Term Post-Hospitalization Housing (the “Room and Board” services). If a Medi-Cal Member reaches the Global Room and Board Cap, they are ineligible for any Room and Board Community Support for the remainder of the 12-month period.
- » **Transitional Rent Cap:** In addition, coverage of Transitional Rent is limited to six months per household per demonstration (current demonstration period ends December 31, 2029). When a household reaches the Transitional Rent Cap, one or more Medi-Cal Members of the household may become eligible for BHSA Housing Interventions-funded rental assistance. As noted above, not all Medi-Cal Members who are eligible for Transitional Rent will also be eligible for BHSA Housing Interventions.
- » **Housing Deposits Cap:** Provision of Housing Deposits is limited to once per individual per demonstration. Housing Deposits can be approved one additional

time during this time period with documentation as to what conditions have changed to demonstrate why providing Housing Deposits would be more successful on the second attempt.

Housing Transition Navigation Services and Housing Tenancy and Sustaining Services are not subject to service duration caps. This means a Medi-Cal Member who is enrolled in an MCP and eligible for either of these services can receive the service for as long as necessary provided that they continue to meet the eligibility criteria. There is also no limit on how many times a Medi-Cal Member may be authorized for these services, so a Medi-Cal Member who has discontinued services may resume services at a later date.

Importantly, as long as a Medi-Cal Member is eligible to receive Housing Transition Navigation Services or Housing Tenancy and Sustaining Services from their MCP, BHSA Housing Interventions **cannot** be used to fund the service for the Medi-Cal Member.

BHSA Housing Interventions **can** be used to fund these services for Medi-Cal Members who are MCP-enrolled but not eligible for these services, who are enrolled in Medi-Cal Fee-for-Service, or who are not eligible for or enrolled in Medi-Cal.

Additional information about the Community Supports caps is provided in the [Community Supports Policy Guide Volume 2](#).

## **7. Are the same settings covered by Transitional Rent and BHSA Housing Interventions?**

All settings covered under Transitional Rent are also allowable under BHSA Housing Interventions.

However, Assisted Living Facilities (Adult Residential Care Facilities, Residential Care Facilities for the Elderly, and Licensed Board and Care Facilities) are allowed under BHSA Housing Interventions but not Transitional Rent. Where it is clinically appropriate for a Medi-Cal Member to be housed in an Assisted Living Facility, the Medi-Cal Member can be housed in such a setting funded by BHSA Housing Interventions for allowable room and board expenses without first exhausting their coverage under Transitional Rent. Please see [Chapter 7, Section C.9.3.4](#) of the BHSA Policy Manual for information on using BHSA Housing Interventions to fund Assisted Living Facilities.

**Table 1. Non-Time-Limited Permanent Settings and Time Limited Interim Settings allowable under Transitional Rent and BHSA Housing Interventions**

Setting	Transitional Rent	BHSA Housing Interventions
<b>Non-Time-Limited Permanent Settings</b>		
Supportive housing	✓	✓
Apartments, including master-lease apartments	✓	✓
Single and multi-family homes	✓	✓
Housing in mobile home communities	✓	✓
Single room occupancy units  Note: Can be interim or permanent	✓	✓
Accessory dwelling units, including Junior Accessory Dwelling Units	✓	✓
Tiny Homes  Note: Can be permanent if meets criteria outlined in the BHSA Policy Manual	✓	✓
Shared housing	✓	✓
Recovery/Sober Living housing, including recovery-oriented housing  Note: Can be interim or permanent	✓	✓
Assisted Living Facilities (Adult Residential Care Facilities, Residential Care Facilities for the Elderly, and Licensed Board and Care Facilities)	X	✓
License-exempt room and board	✓	✓
<b>Time Limited Interim Settings</b>		
Hotel and motel stays	✓	✓
Non-congregate interim housing models	✓	✓
Congregate settings that have only a small number of individuals per room and sufficient	✓	✓

Setting	Transitional Rent	BHSA Housing Interventions
common space (not larger dormitory sleeping halls) (does not include behavioral health residential treatment settings)		
Recuperative Care	X  Recuperative Care is a separate Housing-Related Community Support	✓
Short-Term Post-Hospitalization Housing (STPHH)	X  Short-Term Post-Hospitalization is a separate Housing-Related Community Support	✓
Tiny homes, emergency sleeping cabins, emergency stabilization units	✓	✓
Peer respite*	✓	✓

\*Please note, allowable settings for Recuperative Care and STPHH Community Supports are distinct from those for Transitional Rent. Peer Respite is one of the allowable settings for Recuperative Care and STPHH (as well as Transitional Rent). The complete list of allowable settings for Recuperative Care, STPHH, and Transitional Rent can be found in the [Community Supports Policy Guide Volume 2](#).

## Part II: Considerations for County Behavioral Health Agencies as Providers of Housing-Related Community Supports

BHSA Housing Interventions are intended to serve as a pathway to permanent housing for BHSA eligible individuals, including BHSA eligible Medi-Cal Members who will be transitioning from Transitional Rent. It is critical that county behavioral health agencies and MCPs partner to ensure smooth handoffs and effective transitions between Transitional Rent and BHSA Housing Interventions.

## **1. Can my county behavioral health agency contract with one or more MCPs to be a network provider of the Housing-Related Community Supports?**

Yes. County behavioral health agencies are strongly encouraged to contract with their local MCP(s) to provide Housing-Related Community Supports.

A provider contracting relationship offers an ideal way to facilitate effective sequencing of Housing-Related Community Supports and BHSA Housing Interventions. As an MCP-contracted Transitional Rent Provider, county behavioral health agencies can continue to serve BHSA eligible Medi-Cal Members receiving Housing-Related Community Supports while complying with the statutory prohibition on the use of BHSA funds for housing interventions covered by an MCP provided by W&I Code section 5830, subdivision (c)(2).

County behavioral health agencies should contact their local MCPs now to discuss becoming a Community Supports Provider.

## **2. Why should my county behavioral health agency enter contracts with my local MCPs to be a Transitional Rent Provider?**

A Transitional Rent Provider is the entity that issues payment for housing for Medi-Cal Members receiving Transitional Rent, or directly provides housing for Medi-Cal Members. County behavioral health agencies and other county agencies should develop contracts with their local MCPs to provide Transitional Rent in order to:

- » Provide seamless access to Transitional Rent and the other Housing-Related Community Supports for BHSA clients. In addition, county behavioral health agencies that are contracted to serve as Transitional Rent Providers will be permitted to make a temporary determination that the Medi-Cal Member is qualified to receive Transitional Rent, known as a “streamlined provisional authorization.” This will expedite the process for Medi-Cal Members to receive this service. See additional details in Section 1, Part IV, Question 5.
- » Reduce the risk that Medi-Cal Members are “lost to services” in handoffs between MCPs and county-based providers.
- » Ensure county compliance with W&I Code section 5830, subdivision (c)(2), which prohibits BHSA Housing Interventions from covering housing interventions that can be covered by a Medi-Cal Member’s MCP.

Importantly, in each county in which an MCP operates, the MCP is **required** to offer the county behavioral health agency, or their designated county department or agency, a contract to serve as a Transitional Rent Provider. See the [Community Supports Policy](#)

[Guide Volume 2](#), for more information about MCP expectations for contracting with county behavioral health agencies.

## **Part III: Considerations for County Behavioral Health Agencies as Funders of BHSA Housing Interventions**

### **1. Can my county behavioral health agency use BHSA Housing Interventions to fund rent payments, even though Transitional Rent is provided as a Housing-Related Community Support?**

Yes. County behavioral health agencies can use BHSA Housing Interventions to fund rental assistance for an individual who is BHSA eligible and:

- » Received the maximum coverage of Transitional Rent available under Medi-Cal (six months) and is, thus, not currently eligible to receive Transitional Rent; or
- » Has a clinical need for placement in a setting not covered under Transitional Rent, such as assisted living or licensed board and care (see Section 1, Part I, Question 7); or
- » Is enrolled with an MCP, but does not meet the eligibility criteria for Transitional Rent; or
- » Is enrolled in Medi-Cal Fee-for-Service; or
- » Is not eligible for Medi-Cal.

### **2. For a Medi-Cal Member who is *currently* receiving Transitional Rent, what can my county behavioral health agency use BHSA Housing Interventions to fund?**

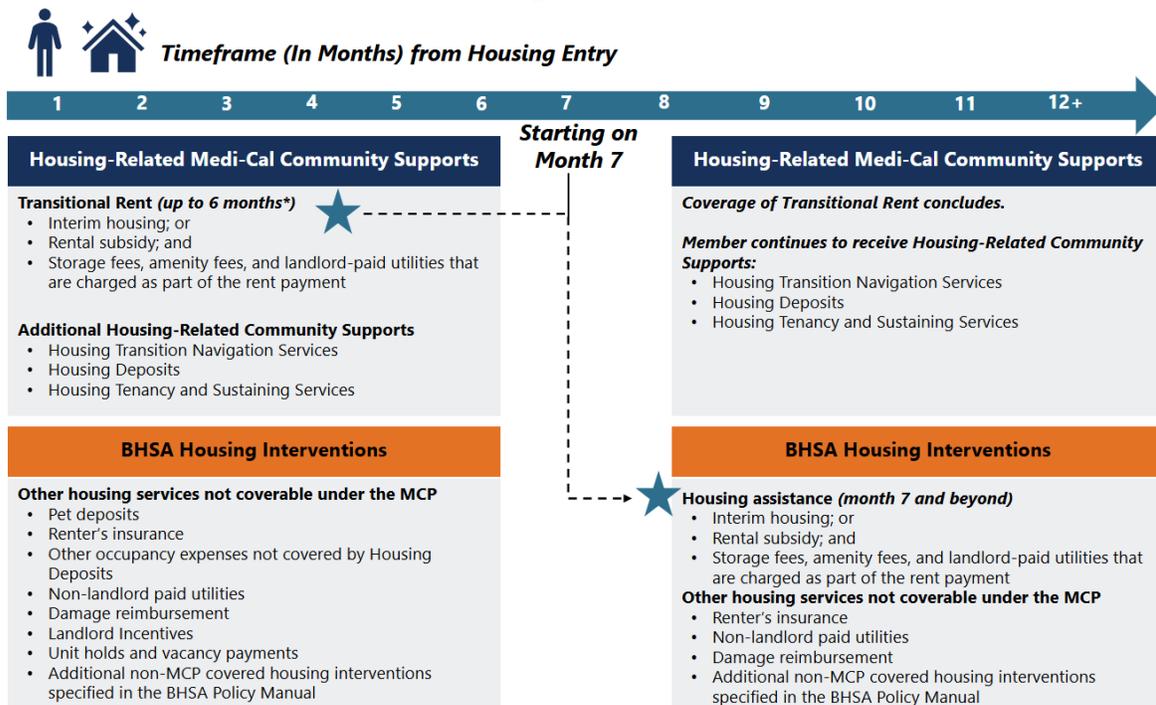
BHSA eligible Medi-Cal Members who are receiving Transitional Rent from their MCP can receive simultaneous BHSA Housing Interventions, so long as those services are not covered by the Medi-Cal Member's MCP. County behavioral health agencies and MCPs are encouraged to work together to address Medi-Cal Members' housing needs through effective braiding of Housing-Related Community Supports and BHSA Housing Interventions.

For example, if a Medi-Cal Member is receiving Transitional Rent through their MCP, BHSA Housing Interventions funding can be used for:

- » Pet deposits;
- » Renter's insurance;
- » Other move-in or occupancy expenses not covered by Housing Deposits;

- » Utilities, when not included as part of rental cost;
- » Damage reimbursement, beyond what is covered in the security deposit;
- » Landlord incentives, unit hold related costs and vacancy payments
- » Additional non-MCP covered housing interventions outlined in the BHSA Policy Manual

**Figure 1. Sequencing Housing Supports for Medi-Cal Members Receiving Transitional Rent and BHSA Housing Interventions**



\*Transitional Rent funding is subject to the global cap on coverage of room and board services as described in Section 1, Part I, Question 6.

**3. If a Medi-Cal Member is eligible for but declines to receive a housing service from their MCP, can my county behavioral health agency provide the service under BHSA Housing Interventions? (Revised December 2025)**

No. Even if the Medi-Cal Member declines to receive Transitional Rent, the county cannot use BHSA Housing Interventions to fund rent payments for that Medi-Cal Member so long as they remain eligible for Transitional Rent. Doing so would violate W&I Code section 5830, subdivision (c)(2). To mitigate this concern county behavioral health agencies are strongly encouraged to contract with their local MCPs to provide Transitional Rent and the other Housing-Related Community Supports so that Medi-Cal

Members who have an established or trusted relationship with their county behavioral health agency can obtain access to Medi-Cal covered housing supports *without* having to connect with their MCP or another service provider. The county behavioral health agency can be the face of these Medi-Cal covered housing services for county clients, while separately—and with little to no involvement from the client—communicating with the MCP to obtain authorization and payment for the services.

**4. Can my county behavioral health agency use BHSA Housing Interventions to fund additional rental assistance to be provided directly to the landlord for a Medi-Cal Member who is currently receiving Transitional Rent?**

No, BHSA Housing Interventions cannot be used to cover any portion of a Medi-Cal Member’s rent payment that is greater than what is covered by Transitional Rent (i.e., BHSA cannot “top-off” the rental subsidy provided under Transitional Rent). BHSA Housing Interventions can fund costs that are not covered by Transitional Rent such as landlord incentives and damage reimbursement for a Medi-Cal Member receiving Transitional Rent (see Section 1, Part III, Question 2 for additional information).

**5. What if an additional rental subsidy funded by BHSA Housing Interventions was provided directly to the Transitional Rent Provider?**

The payment is prohibited, regardless of whether it is provided to the landlord or the Transitional Rent Provider. A Medi-Cal Member currently receiving Transitional Rent may not receive or be the beneficiary of a rental subsidy provided under BHSA Housing Interventions.

**6. What is covered under Transitional Rent in interim settings? (Revised March 2026)**

DHCS recognizes that county agencies and other housing providers typically pay for interim settings using a bundled, per-diem rate approach that, in addition to including the cost of housing the Member, may also cover the costs of things like case management services, meals, and other operating expenses. In alignment with the [Community Supports Policy Guide Volume 2](#) and [Transitional Rent Payment Model](#), Transitional Rent can only cover the cost of housing the Medi-Cal Member in an interim setting. Food and other overhead expenses are not included coverable under Transitional Rent. Additionally, supportive services are not coverable, and in many cases, are separately billable Medi-Cal services (e.g., Housing Tenancy Navigation Services (HTNS), Enhanced Care Management (ECM), others).

DHCS encourages MCPs to build out networks with housing providers whose cost of housing the Member are at or below the Transitional Rent reimbursable ceiling.

Note: While this clarification applies to converted hotels/motels now serving individuals experiencing homelessness, it **does not apply** to commercial hotels/motels. For those settings, the Transitional Rent payment is designed to cover the full cost of a commercial hotel/motel room.

**7. Can my county behavioral health agency use BHSA Housing Interventions, or other funding sources to fund the non-housing cost components of an interim setting for a Medi-Cal Member who is currently receiving Transitional Rent? (Added March 2026)**

County behavioral health agencies may use BHSA Housing Interventions, or other funding sources to cover the other cost components that are not considered the cost of housing the Medi-Cal Member, so long as those cost components are not separately billable Medi-Cal services (e.g., Housing Transition Navigation Services).

This policy also applies to Behavioral Health Bridge Housing (BHBH).

**8. Can my county behavioral health agency use BHSA Housing Interventions to fund expenses that a Medi-Cal Member needs that are not covered under Housing Deposits?**

Yes, BHSA Housing Interventions can be used to fund expenses not covered by the Medi-Cal Member's MCP (e.g., pet deposits). BHSA Housing Interventions can also be used to fund expenses for a Medi-Cal Member who has reached the cap on Housing Deposits coverage (see additional details on Housing Deposits cap above).

**9. Are there time limitations on BHSA Housing Interventions funding for Medi-Cal Members in interim settings?**

Yes, BHSA Housing Interventions funding for interim settings is **limited to six months** for Medi-Cal Members who have exhausted the Transitional Rent benefit and **12 months** for individuals not eligible for Transitional Rent. At that point, an individual must be transitioned to a permanent setting to continue receiving BHSA Housing Interventions funding for housing. DHCS strongly encourages MCPs and county behavioral health agencies to work with Medi-Cal Members to find permanent housing placements.

**10. If a Medi-Cal Member does not receive coverage of the full 6 months of Transitional Rent in an interim setting, can BHSA Housing Interventions provide more than 6 months of coverage in an interim setting? (Added March 2026)**

Yes, if a Medi-Cal Member does not utilize the full 6 months of Transitional Rent, BHSA Housing Interventions can cover the difference between the number of months of Transitional Rent received and the BHSA Housing Interventions' 12-month interim settings limit. For example, if a Medi-Cal Member receives only three months of Transitional Rent, they can receive up to nine more months of coverage in an interim setting funded by BHSA Housing Interventions. Medi-Cal Members utilizing Transitional Rent may not receive more than 12 months of interim housing across Transitional Rent and BHSA Housing Interventions.

Any time a Medi-Cal Member spent receiving Medi-Cal-covered Recuperative Care or Short-Term Post-Hospitalization Housing (STPHH) does **not** count toward the BHSA Housing Interventions' 12-month interim settings limit.

**11. Is my county behavioral health agency required to use BHSA Housing Interventions to continue funding permanent rental assistance or interim housing for every BHSA eligible Medi-Cal Member who uses the full six months of Transitional Rent? Must this county support be indefinite? (Added December 2025)**

County behavioral health agencies are not required to commit to housing Medi-Cal Members exiting Transitional Rent indefinitely, or for any minimum number of months. Importantly, however, for **interim** settings, county behavioral health agencies and MCPs are required to coordinate on a Housing Support Plan prior to MCP authorization of Transitional Rent for Medi-Cal Members in the Transitional Rent BH POF, and there is a twelve month combined **maximum** for coverage of interim settings under Transitional Rent and BHSA (see Section 1, Part III, Question 10). The Housing Support Plan should detail how the Medi-Cal Member will seek to obtain long-term housing stability.

DHCS recognizes that the county behavioral health agency's commitment to housing Medi-Cal Members exiting Transitional Rent will depend on a variety of factors, including individual need, the individual's eligibility for BHSA Housing Interventions, the county's approach to allocating BHSA funding, individual access to housing or rental subsidies financed through other sources, and housing supply.

**12. Can county behavioral health agencies or flex pools use BHSA Housing Interventions funds or Behavioral Health Bridge Housing funds to cover the costs of providing Transitional Rent or the other Housing-Related Community Supports while they wait for payment from the MCP? (Added December 2025)**

Yes. County behavioral health agencies **who are contracted providers of Transitional Rent**, as well as Flex Pools, may use BHSA Housing Interventions or Behavioral Health Bridge Housing (BHBH) funds as a cash advance for Transitional Rent and other Housing-Related Community Supports, in order to immediately house individuals and/or provide non-rental assistance housing supports. The advance must be provided in accordance with Medi-Cal requirements and service limitations. The county behavioral health agency or Flex Pool is expected to obtain authorization and seek reimbursement from the MCP after using either of these funding sources as an advance. Once the service is authorized by the MCP and the county behavioral health agency receives reimbursement, the reimbursement provided must go back into the BHSA subaccount for housing. The expense does not count for reversion or BHOATR purposes.

**13. What are the expectations for data sharing between county behavioral health agencies and MCPs with respect to the Housing-Related Community Supports and BHSA Housing Interventions? Where can we find additional guidance and resources to support our efforts to exchange data with MCPs?**

County behavioral health agencies and MCPs are expected to share data to support bi-directional referrals and care coordination, including as it relates to BHSA Housing Interventions and the Housing-Related Community Supports. County behavioral health agencies should utilize the data sharing policies and processes they have already put in place under the Memorandums of Understanding (MOU) with their local MCPs.

To facilitate effective data exchange with MCPs and other system partners, county behavioral health agencies are strongly encouraged to sign on to the [Data Exchange Framework](#) (DxF). (MCPs are required signatories to the DxF.)

County behavioral health agencies are also encouraged to take advantage of the resources available on the [DHCS Data Exchange and Data Sharing](#) page, including the Data Sharing Authorization Guidance (DSAG), the DSAG Medi-Cal Housing Support Services Toolkit.

**14. For individuals residing in treatment settings, can BHSA Housing Interventions be used to cover housing supports other than room and board (e.g., navigation, storage fees, pet deposits)? (Added December 2025)**

Yes, individuals residing in treatment settings may receive housing supports funded by BHSA Housing Interventions if they meet the requirements of eligible populations for Housing Interventions, and so long as those individuals are not otherwise eligible to receive the housing supports from their MCP (per W&I Code section 5830(c)(2)).

However, BHSA Housing Interventions may *not* be used to cover the costs of room or board in the treatment setting itself. Residential treatment settings are not an allowable setting type under BHSA Housing Interventions. The complete list of allowable settings for BHSA Housing Interventions is provided in Appendix B of the BHSA Policy Manual.

## **Part IV: County Behavioral Health Agency role in Transitional Rent Eligibility and Authorization**

**1. If my county behavioral health agency believes an individual may be eligible for Transitional Rent, but the individual is not enrolled in Medi-Cal, what is the county behavioral health agency required to do?**

County behavioral health agencies must refer the individual to the county Department of Social Services (DSS) for Medi-Cal eligibility screening and enrollment support. For additional details see [Section 6.C.2.2](#) of the BHSA Policy Manual. Before an individual is enrolled in Medi-Cal, they may receive services funded by BHSA Housing Interventions, without regard to W&I Code section 5830, subdivision (c)(2).

**2. What does my county behavioral health agency need to know about the MCP's process for authorizing Transitional Rent?**

County behavioral health agencies may be engaged by MCPs in two specific parts of the Transitional Rent authorization process:

- » **Housing Support Plan:** As part of the authorization process for any Medi-Cal Member to receive Transitional Rent, MCPs require a comprehensive Housing Support Plan (HSP) for each Medi-Cal Member. The HSP outlines a permanent housing solution for the Medi-Cal Member. While not required, MCPs or MCP-contracted providers may engage county behavioral health agencies if needed for input on the housing support plan and specifically, on the availability of supports under BHSA Housing Interventions (both at the expiration of and during the receipt of Transitional Rent). Additional information about the

required components of the housing support plan be found in the [Community Supports Policy Guide Volume 2](#).

- » **Interim settings:** MCPs must ensure the Medi-Cal Member can secure a long-term rental subsidy following receipt of Transitional Rent. To do this, the MCP will need to inquire with the Medi-Cal Member's county behavioral health agency as to whether the Medi-Cal Member is BHSA-eligible and will be able to transition to BHSA Housing Interventions at the expiration of Transitional Rent. If the county behavioral health agency reports that the Medi-Cal Member is not BHSA-eligible or that it cannot commit to seeking to fund continued interim or permanent housing for the Medi-Cal Member at the expiration of Transitional Rent, the MCP cannot provide the Medi-Cal Member with Transitional Rent in an interim setting unless the Medi-Cal Member has or is able to secure another long-term rental subsidy such as a HUD Housing Choice Voucher for use at the expiration of Transitional Rent.
- » County behavioral health agencies should expect to receive inquiries from MCPs as part of the Transitional Rent authorization process for Medi-Cal Members in interim settings. DHCS recognizes that the ability of county behavioral health agencies to transition Medi-Cal Members to BHSA Housing Interventions is subject to funding availability. County behavioral health agencies are expected to respond to MCP inquiries, regardless of funding availability.

### **3. What level of detail is DHCS expecting in the Medi-Cal Members' Housing Support Plan (HSP)? (Revised March 2026)**

A Medi-Cal Member's HSP acts as a personalized roadmap to help a Medi-Cal Member on their journey from homelessness or housing instability into long-term housing stability. DHCS will not be prescribing a HSP template, to allow for variation to meet the needs of different communities. DHCS acknowledges that a Medi-Cal Member's HSP may include different levels of detail depending on where the Medi-Cal Member is in their housing journey and the type of setting they are being housed in.

Section 5.B of the Community Supports Policy Guide Volume 2 outlines the required components of the HSP. At a minimum, a HSP needed to authorize Transitional Rent in permanent or interim settings must:

- » Identify the permanent housing strategy and solution for the Medi-Cal Member, including payment sources and mechanism;
- » Identify the full-range of permanent housing solutions;

- » Be informed by Medi-Cal Members' preferences and needs, and reviewed and revised as Medi-Cal Members' needs change;
- » Be based on an assessment that addresses identified barriers; and
- » Be developed in a way that culturally appropriate and trauma-informed.

When a Medi-Cal Member will be placed in a **permanent setting**, the Medi-Cal Member is expected to have a comprehensive Housing Support Plan, that includes all of the required elements (outlined above). *Note:* A Flex Pool can satisfy the requirement of detailing a Medi-Cal Member's identified permanent housing solution and long-term strategy for retaining housing in the HSP with a blanket statement indicating that a Medi-Cal Member has secured a permanent subsidy through the Flex Pool.

When a Medi-Cal Member will be placed in an **interim setting**, a HSP must also be in place, though DHCS recognizes it may be less complete while the Member's long-term housing plan is being developed. The county behavioral health agency and MCP must coordinate and confirm that the Medi-Cal Member is BHSA-eligible and will be able to transition to BHSA Housing Interventions at the expiration of Transitional Rent, if the Medi-Cal Member is otherwise not able to secure a HUD Housing Choice Voucher, permanent supportive housing subsidy, or other long-term rental subsidy to transition to at the expiration of coverage under Transitional Rent. This confirmation from the county behavioral health agency must be obtained regardless of whether the department is acting as the Medi-Cal Member's Transitional Rent Provider, and must be documented in the Medi-Cal Member's housing support plan. However, as noted in Section 1, Part III, Question 11, county behavioral health agencies are not required to commit to housing Medi-Cal Members exiting Transitional Rent indefinitely, or for any minimum number of months.

#### **4. Can an existing Housing Support Plan (e.g., developed by a housing navigator) be used as a Medi-Cal Member's Housing Support Plan for purposes of Transitional Rent? (Added March 2026)**

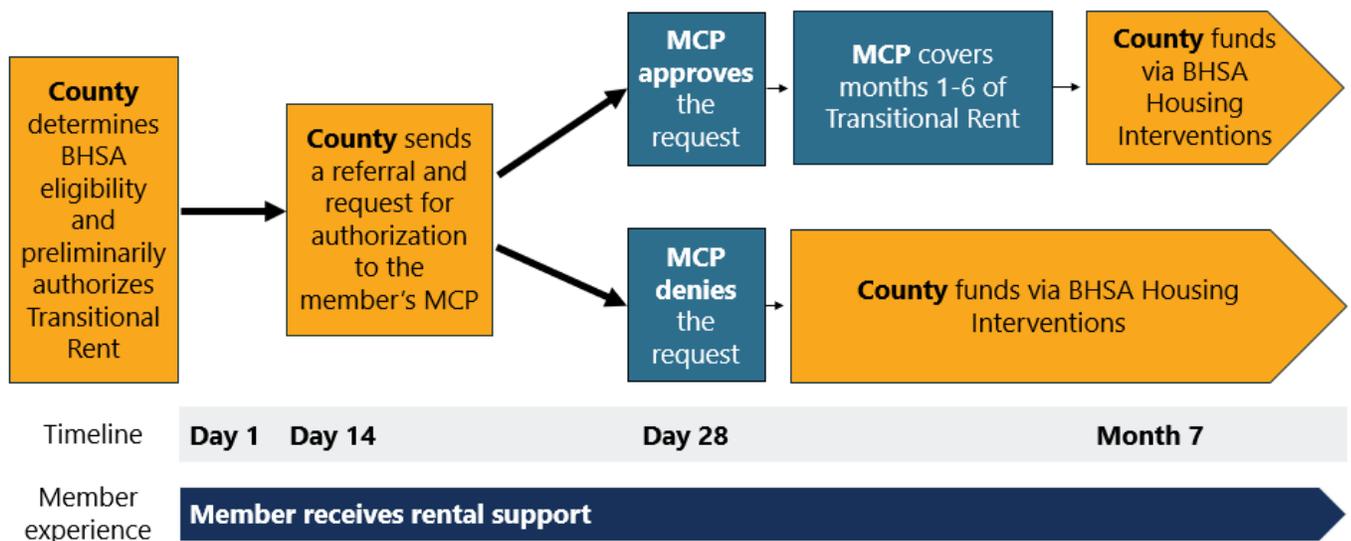
Yes, so long as they meet the requirements specified in the [Community Supports Policy Guide Volume 2](#). The Housing Support Plan does not need to have been created for the purpose of Transitional Rent authorization, or have been prepared by an MCP-contracted provider.

## 5. Streamlined provisional authorizations for Transitional Rent

### a. What is “streamlined provisional authorization” for Transitional Rent?

To support the use of county behavioral health agencies as an entry point for Transitional Rent and reduce delays in the process that may hinder utilization, county behavioral health agencies will be permitted to conduct “streamlined provisional authorizations” for Transitional Rent (subject to the conditions described in Section 1, Part IV, Question 5b). **Streamlined provisional authorization enables county behavioral health agencies to make a temporary determination that a Medi-Cal Member is qualified to receive Transitional Rent.** For more information on streamlined provisional authorization, see [Community Supports Policy Guide Volume 2](#).

**Figure 2. Example of Streamlined Provisional Authorization Timeline Flow**



### b. What is required of my county behavioral health agency to conduct streamlined provisional authorizations for Transitional Rent?

County behavioral health agencies can conduct streamlined provisional authorizations when the following conditions are met:

- The **county behavioral health agency is contracted with the Medi-Cal Member’s MCP** as a Transitional Rent Provider.
- The county behavioral health agency determines that the Medi-Cal Member is BSA-eligible and **commits to providing the Medi-Cal Member with BSA Housing Interventions at the expiration of**

**Transitional Rent**, or upon denial of the request for coverage by the MCP. Given county behavioral health agencies will have already conducted a streamlined provisional authorization, DHCS expects MCP denials to be infrequent, and occurring primarily in situations where the Medi-Cal Member has reached the MCP Global Room and Board Cap.

- The county behavioral health agency commits to sending a referral and request for authorization to the Medi-Cal Member's MCP in a timely manner: at minimum, within 14 days of the county behavioral health agency's streamlined provisional authorization.
- Consistent with [APL 21-011](#), the MCP must authorize or deny coverage of Transitional Rent within the shortest applicable timeframe, but no longer than five business days from the MCP's receipt of information reasonably necessary and requested by the MCP to make a determination, not to exceed 14 calendar days from the MCP's receipt of the referral from the county behavioral health agency.

**c. If my county behavioral health agency is a contracted Transitional Rent Provider, can I delegate streamlined provisional authorizations to a housing provider or other county agency?**

Yes. Upon agreement with the MCP, county behavioral health agencies may delegate streamlined provisional authority to another county agency or to another organization, including but not limited to a Flex Pool.

**6. If an individual already receiving BHSA Housing Interventions enrolls in an MCP, is my county behavioral health agency then required to seek Transitional Rent authorization for that Medi-Cal Member? (Added December 2025)**

If the individual already receiving BHSA is housed in an interim setting, once the individual reaches the BHSA Housing Interventions time limit of 12 months, the county behavioral health agency must seek Transitional Rent authorization before using BHSA Housing Interventions for rental assistance in a permanent setting. If the individual already receiving BHSA is housed in a permanent setting, they may continue receiving BHSA Housing Interventions for rental assistance, but are encouraged to seek Transitional Rent authorization for Medi-Cal Members receiving BHSA Housing Interventions.

If the county behavioral health agency is a contracted Transitional Rent Provider, the county behavioral health agency may use BHSA Housing Interventions or Behavioral

Health Bridge Housing (BHBH) funds to cover the costs of providing Transitional Rent while they wait for payment from the MCP under the conditions outlined in Section 1, Part III, Question 12.

## Section 2: Guidance for Integrating Medi-Cal in the Transition from MHSA and BHBH to Behavioral Health Services Act

This section of the FAQ is organized as follows:

- » **Part I:** Leveraging Medi-Cal in the Transition from Mental Health Services Act to BHSA Housing Interventions.
- » **Part II:** Leveraging Medi-Cal in the Transition from Behavioral Health Bridge Housing to BHSA Housing Interventions.

### Part I: Leveraging Medi-Cal in the Transition from Mental Health Services Act to BHSA Housing Interventions

#### 1. Can individuals who are currently housed under the Mental Health Services Act (MHSA) be transferred directly to BHSA Housing Interventions upon BHSA go-live without first accessing Transitional Rent? (Added December 2025)

Yes. To elaborate on the information provided under “Individuals Transitioning from MHSA to BHSA” in the BHSA Policy Manual, see details related to the services provided below.

MHSA Funded Service	Policy on Transitioning to BHSA Housing Interventions
<b>Permanent housing</b>	The county behavioral health agency may facilitate an immediate transition to permanent rental assistance or permanent housing funded under BHSA Housing Interventions. Use of Transitional Rent is not required. This policy is published in <a href="#">BHSA Policy Manual Chapter 7, Section C.4.3 Individuals Transitioning from MHSA to BHSA</a> .
<b>Interim settings (e.g., hotel/motel)</b>	Use of Transitional Rent is strongly encouraged but not required. The county behavioral health agency may facilitate an immediate transition from MHSA to interim housing funded under BHSA Housing Interventions. The BHSA 6-month time limit for interim settings will apply from the date of transfer from Transitional Rent to BHSA Housing Interventions.
<b>Housing supportive services</b>	Use of the comparable Housing-Related Community Support is strongly encouraged but not required. The county behavioral

<b>MHSA Funded Service</b>	<b>Policy on Transitioning to BHSA Housing Interventions</b>
<b>(comparable Housing-Related Community Support)</b>	health agency may facilitate an immediate transition from MHSA to BHSA Housing Interventions.

DHCS recognizes that BHSA Housing Interventions dollars are limited and in most if not all communities, insufficient to address the significant need for housing services among BHSA-eligible individuals experiencing or at risk of homelessness. For this reason, DHCS strongly encourages county behavioral health agencies to leverage the Housing-Related Community Supports—to the maximum extent possible—so that BHSA Housing Interventions dollars can go even further toward addressing the needs of BHSA-eligible individuals experiencing or at risk of homelessness.

## **Part II: Leveraging Medi-Cal in the Transition from Behavioral Health Bridge Housing to BHSA Housing Interventions**

### **1. Can individuals already receiving Behavioral Health Bridge Housing (BHBH) services be eligible for Transitional Rent? (Added December 2025)**

Yes, if they otherwise meet Transitional Rent eligibility. An individual’s eligibility for Transitional Rent is based on their status at the time they entered BHBH. For example, if an individual was experiencing unsheltered homelessness prior to entering BHBH, that eligibility criteria will continue to be considered when determining eligibility for Transitional Rent.

### **2. What are the limitations on the use of BHBH funds for Medi-Cal Members enrolled in MCPs who are eligible for Housing-Related Community Supports? (Revised March 2026)**

The limitations on the use of BHBH funds for Medi-Cal Members eligible for Housing-Related Community Supports is as follows:

#### **For Medi-Cal Members receiving BHBH services on January 1, 2026:**

- » BHBH funds may continue to be used for housing, even if the Medi-Cal Member is eligible for Transitional Rent.
- » BHBH funds may not be used for any other Housing-Related Community Support if there is at least one provider (county or otherwise) contracted with the Medi-Cal Member’s MCP to furnish that service.

### **For Medi-Cal Members not receiving BHBH services on January 1, 2026:**

The sequencing requirements, differ based on the status of Housing-Related Community Supports contract formation in the county at the time the county behavioral health agency is seeking to deliver the housing-related services. There are three potential scenarios for which the requirements differ. The three scenarios are:

- » **Scenario 1:** If the county behavioral health agency or their designated county agency is contracted with the MCP to deliver the Housing-Related Community Supports service, then the county is required to utilize Housing-Related Community Supports funding, as eligible, before using BHBH to cover a Medi-Cal Member's housing services.
- » **Scenario 2:** If a county behavioral health agency or their designated county agency is not contracted with the MCP to deliver the Housing-Related Community Supports service, but the MCP is contracted with another Community Supports Provider in the county in its network to deliver the service, then the county behavioral health agency must refer the Medi-Cal Member to the Medi-Cal Member's MCP for the use of Housing-Related Community Supports, as eligible, before using BHBH to cover a Medi-Cal Member's housing services.
- » **Scenario 3:** If a county behavioral health agency or their designated county agency is not contracted with the MCP to deliver the Housing-Related Community Supports service, and the MCP is not contracted with any other Community Supports Provider in the county to deliver the service at this time, then the county behavioral health agency may use BHBH to cover that specific housing service for a Medi-Cal Member. (Note: DHCS expects this scenario to diminish over time as MCPs expand contracting for Transitional Rent).

### **3. Can my county behavioral health agency use Behavioral Health Bridge Housing (BHBH) to fund services concurrently for a Medi-Cal Member receiving Housing-Related Community Supports provided by their MCP? (Added December 2025)**

Yes, county behavioral health agencies can provide BHBH funded services to a Medi-Cal Member who is also receiving Housing-Related Community Supports funded by their MCP. The principles that apply are the same as those that apply to braiding BHSA Housing Interventions funding and Medi-Cal Community Supports (see Section 1, Part III, Question 2 of this document).

#### **4. Can Behavioral Health Bridge Housing (BHBH) be used as a cash advance payment for Transitional Rent or the other Housing-Related Community Supports? (Added December 2025)**

Yes. The same principles that govern the use of BHSAs Housing Interventions as a cash advance payment for Transitional Rent or other Housing-Related Community Supports also apply to using BHBH for cash advance payments while BHBH is still in effect, as outlined in Section 1, Part III, Question 12.

#### **5. What if a Medi-Cal Member has an urgent need for interim housing—can my county behavioral health agency use BHBH or BHSAs Housing Interventions in those instances? (Added March 2026)**

DHCS acknowledges there are times when county behavioral health agencies need access to flexible funding to address urgent housing needs.

**Scenario 1: If the county behavioral health agency or their designated county agency is a contracted Transitional Rent Provider**, the county may leverage:

- » Streamlined Provisional Authorization (see Section 1, Part IV, Question 5 for more details)
- » Use of BHBH and BHSAs Housing Interventions funds as a cash advance for Medi-Cal Members receiving Transitional Rent or other Housing-Related Community Supports (see Section 1, Part III, Question 12 for more details on the cash advance)

**Scenario 2: If the county behavioral health agency is not a contracted Transitional Rent Provider but there is another Provider contracted with the MCP to deliver Transitional Rent**, the county behavioral health agency may use BHBH or BHSAs Housing Interventions funds for up to **21 calendar days** to cover immediate housing costs and any related housing navigation support costs for Medi-Cal Members with urgent housing needs.

- » Within seven calendar days of the 21-day timeframe, the county behavioral health agency or their designated county agency must develop a Housing Support Plan and submit a Transitional Rent referral to the Medi-Cal Member's MCP. (Note: As required by APL 21-011, MCPs have 14 days to render a decision on a provider's request for authorization).
- » At the conclusion of the 21 calendar days, county behavioral health agencies may no longer use BHBH or BHSAs Housing Interventions for any Housing-Related Community Support the Medi-Cal Member is eligible to receive from

their MCP so long as the MCP is contracted with at least one provider (county or otherwise) within the county to furnish the needed service.

**Scenario 3: If there is no Transitional Rent Provider contracted with the MCP in the county to deliver Transitional Rent at this time**, and thus the county is funding the Medi-Cal Member using BHBH, then the county can continue to use BHBH after the urgent interim housing timeframe. (Note: DHCS expects this scenario to diminish over time as MCPs expand contracting for Transitional Rent.)

**6. If an individual was considered chronically homeless before receiving Behavioral Health Bridge Housing (BHBH) services, are they considered chronically homeless for the purposes of BHSA Housing Interventions? (Added December 2025)**

Yes, anyone who was chronically homeless when housed under BHBH, and who was transferred from BHBH to BHSA, will be considered chronically homeless for purposes of the requirement to direct 50 percent of BHSA Housing Interventions to individuals who are chronically homeless.

**7. Can my county behavioral health agency use Behavioral Health Bridge Housing (BHBH) or BHSA Housing Interventions to cover services for Medi-Cal Members who are receiving Housing-Related Community Supports and are in the process of switching MCPs? (Added March 2026)**

As detailed in the [Community Supports Policy Guide Volume 2, VIII. Engaging Members In Community Supports](#): "If a Medi-Cal Member transitions to a new MCP and the new MCP offers the same Community Support(s) that the Medi-Cal Member received under their previous MCP, then the new MCP must honor the Community Support authorization for that Medi-Cal Member." See the linked guide for additional information about MCP requirements.

This means that Medi-Cal Members who are receiving Housing-Related Community Supports while transitioning MCPs will retain access to the Housing-Related Community Supports they are receiving through their new MCP. The only exception would be if the new MCP does not cover the specific Housing-Related Community Support the current MCP is covering. However, this should be extremely rare. All MCPs are required to cover Transitional Rent for the Behavioral Health Population Of Focus effective 1/1/26, and currently, all MCPs have elected to cover Housing Transition Navigation Services (HTNS), Housing Tenancy and Sustaining Services (HTSS), and Housing Deposits and nearly all cover Short-Term Post-Hospitalization Housing and Recuperative Care. MCP coverage elections with respect to the Community Supports are available on the DHCS website, [CalAIM Community Supports Managed Care Elections](#).

BHSA Housing Interventions or BHBH may not be used to provide the specific Housing-Related Community Support the Medi-Cal Member was receiving except in the rare instances where the new MCP does not cover that specific Community Support, or where the Member is in need of urgent interim housing in which case time-limited coverage may be provided under BHSA or BHBH as discussed in Section 2, Part II Question 5.

## Section 3: Other Behavioral Health Services Act

### Housing Interventions Guidance

#### 1. **Can BHSA Housing Interventions be used to cover debt financing costs? (Added December 2025)**

Yes, BHSA Housing Interventions operating subsidies can be used to cover operating costs, including both principal and interest on loans or financing debts incurred in connection with the acquisition or development of housing for individuals experiencing or at risk of homelessness.

#### 2. **Can a small county receiving an exemption from the requirement to spend 30% of BHSA funds on Housing Interventions still spend a portion of their Housing Interventions funds on housing outreach and engagement? (Added March 2026)**

Yes, small counties receiving an exemption to spend less than 30% of their BHSA funds on Housing Interventions can still dedicate up to 7% of their remaining Housing Interventions allocation to **housing** outreach and engagement.

Small counties requesting an exemption from the requirement to spend 30% of their BHSA funds on Housing Interventions should specify the percent of funds they propose to spend on housing outreach and engagement in their exemption request.