TRANSITIONAL RENT HMIS PROJECT SETUP INSTRUCTIONS

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November 2026

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PURPOSE

The Department of Health Care Services (DHCS) is providing these project setup instructions to support Managed Care Plans (MCPs), Transitional Rent providers, and Community Supports Housing Trio providers, and Flex Pool providers (for the purposes of this document, collectively referred to as "providers"), and Homeless Management Information System (HMIS) Lead Agencies (hereafter referred to as HMIS Leads) and ensure consistent recording of Transitional Rent.[1] As a Medi-Cal Community Support delivered through managed care, Transitional Rent falls within DHCS' administrative and oversight authority. DHCS is responsible for administering Transitional Rent and establishing program requirements. Cal ICH specifies the HMIS data-entry format for AB 977 reporting in consultation with DHCS. These instructions reflect the agencies' respective responsibilities.

BACKGROUND

Assembly Bill 977 (AB 977) requires Transitional Rent, as a state homelessness program, to report specified participant data in HMIS. These requirements are intended to improve the State's understanding of whom the homelessness response system (HRS) serves, assess program outcomes, and support better-informed policy decisions.

As detailed in the following sections, Transitional Rent must be recorded through separate Transitional Rent-specific HMIS projects, with Member enrollment and exit dates reflecting the period during which the Member receives the Transitional Rent benefit. These requirements establish a standardized approach for MCPs, providers, and HMIS Leads to set up Transitional Rent projects and record Transitional Rent in HMIS consistent with AB 977, the U.S. Department of Housing and Urban Development (HUD) HMIS Standards, and applicable state reporting requirements.

Standardized reporting will enable DHCS and the California Interagency Council on Homelessness (Cal ICH) to identify Transitional Rent participation in statewide homelessness data while supporting accurate local and federal reporting requirements. The data made available by these reporting standards will create a more accurate account of the individuals and families served by the HRS and a more comprehensive understanding of the effects of state-funded homelessness programs to drive quality improvement and service delivery.

[1] Transitional Rent is a Community Support available through Medi-Cal. For more information, see Community Supports Policy Guide Volume 2.

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These requirements are intended to:

- Promote consistent recording of Transitional Rent in HMIS for AB 977 reporting and statewide analysis. HMIS and Homeless Data Integration System (HDIS) data may supplement DHCS' oversight, monitoring, and compliance, but are not the authoritative source for administering or validating a Member's cumulative six-month Transitional Rent benefit.
- Outline appropriate HMIS setup, as this directly affects the ability to identify and track individuals experiencing homelessness, including eligibility, prioritization, and outcomes.
- Prevent unintended consequences of incorrect HMIS setup, which could affect an individual's access to programs or result in duplicate or conflicting project enrollments.

MCPs and providers will need to work with their local HMIS Lead to gain access to the HMIS for the Continuum(s) of Care (CoC) in which the projects are located. See section on Roles and Responsibilities below for more information.

Transitional Rent and BHSA Housing Interventions: What's Different?

Transitional Rent and Behavioral Health Services Act (BHSA) Housing Interventions support similar populations experiencing or at risk of homelessness and may support the same individual at different points in their housing journey. County behavioral health agencies and MCPs are expected to coordinate and appropriately sequence available funding sources, including transitions from Transitional Rent to BHSA-funded assistance when appropriate and allowable.

DHCS has aligned Transitional Rent HMIS project instructions with the published BHSA HMIS Project Setup Instructions where possible. However, differences in the funding structures and duration of assistance for each program require some differences in how they are tracked and recorded in HMIS.

- **Funding Structure:** BHSA Housing Interventions funding is generally associated with a housing program or project, whereas Transitional Rent is a Medi-Cal benefit authorized and funded for an individual Member. As a result, Transitional Rent funding must be identifiable at the client level in HMIS. Identifying Transitional Rent only as a funding source for the overall HMIS project is not sufficient to distinguish which clients are receiving the benefit.
- **Duration of Assistance:** Transitional Rent is a defined, time-limited benefit of up to six months for an individual Member. In contrast, BHSA Housing

Interventions funding may support non-time-limited rental assistance in permanent housing settings. Because Transitional Rent is limited to a defined period, HMIS reporting must identify and track when an individual is receiving Transitional Rent (i.e., the specific period of the placement supported by the Transitional Rent benefit).

About Transitional Rent

Transitional Rent is a Medi-Cal Community Support that provides up to six months of rental assistance in interim and permanent settings. Beginning January 1, 2026, all Medi-Cal MCPs are required to cover Transitional Rent to eligible Members of the behavioral health population of focus.[2] Transitional Rent is intended to help Members connect to health care services and avoid returning to homelessness and to support transitions into housing while longer-term funding sources and supports are arranged.[3]

The following summary is based on Community Supports Policy Guide Volume 2 and does not establish new policy. For full details, please refer to the DHCS Community Supports Guide Volume 2.

Populations eligible for Transitional Rent. Eligible high-need members enrolled in an MCP may be eligible for Transitional Rent if they meet the following criteria:[4]

- Are experiencing or at risk of homelessness; and
- Meet clinical Risk Factors (e.g., serious chronic physical health condition, or physical, intellectual, or developmental disabilities); and
- Have either recently undergone a critical life transition (such as exiting an institutional or carceral setting or foster care), or who meet other specified eligibility criteria.

Members must meet the HUD definition of homeless or at risk of homelessness, as defined in Section 91.5 of Title 24 of the Code of Federal Regulations (CFR), with three additional modifications as defined in Appendix C of the DHCS Community Supports Guide Volume 2.

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[2] For more information on Transitional Rent Implementation Timeline and Populations of Focus see the Community Supports Policy Guide Volume 2 (page 61).

[3] For additional guidance and resources, see the Community Supports Policy Guide Volume 2 (page 57).

[4] See the DHCS Community Supports Guide Volume 2 and any subsequent updates for more details.

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Allowable Settings. Transitional Rent may cover stays in a variety of both permanent and interim settings (*see Table 1*).[5] Certain housing types may function as either permanent or interim housing depending on the characteristics of the arrangement. A housing arrangement is considered permanent when the Member has a renewable lease agreement. Where there is no lease agreement, or the lease is not renewable, the setting is considered interim.[6]

Duration. The Transitional Rent benefit provides up to a maximum of six months of rental assistance per household in interim or permanent housing settings. These six months do not have to be continuous and can happen at any point during the demonstration period.[7] For example, a Member could receive the benefit between January 1, 2027 and February 28, 2027, and then receive the remaining four months later, as long as it is within the demonstration period.

Once the Transitional Rent benefit has been exhausted, Members are expected to transition to non-Medi-Cal funded housing, which may occur within the same housing setting or in a different setting. While HMIS administrators are not responsible for determining Member eligibility for Transitional Rent or assessing whether a setting meets Community Supports requirements, understanding the range of allowable settings is important for implementing the HMIS recording approaches described in this guidance.

For Transitional Rent, both the allowable housing settings and the eligible population served, including whether Members are experiencing or at risk of homelessness, inform the appropriate HMIS Project Type. The Project Set Up section below describes these considerations and the corresponding HMIS Project Types in greater detail.

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[5] DHCS defines permanent settings as those with a renewable lease agreement with a term of at least one month.

[6] A complete description of allowable settings is available in the DHCS Community Supports Policy Guide Volume 2 Section VII.C.

[7] Transitional Rent is authorized under California's Behavioral Health Community-Based Organized Networks of Equitable Care and Treatment (BH-CONNECT) 1115 Waiver, also known as a demonstration. The current demonstration period ends December 31, 2029.

Table 1. Transitional Rent Allowable Settings

Permanent Settings	Interim Settings

» Single-family and multi-family homes (e.g., duplexes)
» Apartments
» Housing in mobile home communities
» Accessory dwelling units (ADUs)
» Shared housing—where two or more people live in one rental unit
» Project-based or scattered site permanent supportive housing
» Single room occupancy (SRO) units
» Tiny homes
» Recovery housing
» License-exempt room and board
	» Single room occupancy (SRO) units
	» Tiny homes
	» Hotels/motels when serving as the Member's primary residence
	» Interim settings with a small number of individuals per room (not large dormitory sleeping halls)
	» Transitional and recovery housing with no lease agreement, including:
	  » Bridge, site-based, population-specific, and community living programs that may or may not offer supportive services and programming
	  » License-exempt room and board
	  » Peer respite

Why Transitional Rent Must Be Reported in HMIS

Pursuant to AB 977, the State of California requires recipients of state funded homelessness programs implemented after 2021 to enter specific data elements related to individuals and families into their local HMIS.[8] AB 977 established these requirements to improve the state's ability to understand whom the HRS serves, assess the effects of state-funded homelessness programs, and make better-informed policy decisions. Data entered into local HMIS systems are integrated into the HDIS, California's statewide homelessness data warehouse, to support statewide analysis of homelessness and the programs serving this population.

Note: Other Medi-Cal Housing Supports, such as Housing Transition Navigation Services, Housing Tenancy and Sustaining Services, and Housing Deposits are not required to be recorded in HMIS at this time.

[8] For more information on what state programs are required to comply see: https://calich.ca.gov/ab977.html

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A state homelessness program is defined as a program funded, in whole or in part, by the state with the express purpose of addressing or preventing homelessness or providing services to people experiencing homelessness. Because Transitional Rent is funded in part by the state and is intended to help eligible Medi-Cal Members experiencing or at risk of homelessness secure and maintain housing, Transitional Rent is subject to AB 977 HMIS reporting requirements.

The data entry format specified in this document is based on project setup information provided by the California Interagency Council on Homelessness (Cal ICH), which is statutorily required to specify the format for data entry into HMIS in consultation with administering departments, including the California Department of Health Care Services (DHCS). This document specifies the format for HMIS data entry and describes the project setup to ensure that Transitional Rent HMIS reporting aligns with other statewide requirements.

Standardized HMIS project setup and data entry are important to support consistent statewide reporting of Transitional Rent and to ensure that DHCS can reliably aggregate and analyze data across HMIS implementations.

PROJECT SETUP AND DATA ENTRY REQUIREMENTS

Roles and Responsibilities

MCPs, providers, CoCs, and HMIS Leads have distinct but complementary responsibilities for Transitional Rent HMIS reporting (see Table 2). MCPs and providers must work with the applicable HMIS Lead to configure (i.e., set up) HMIS projects and workflows consistent with DHCS and Cal ICH guidance and to coordinate with HMIS vendors, as necessary, to operationalize reporting requirements. Depending on local organizational structures, a provider, county, CoC, or HMIS Lead may be the same entity or separate entities. MCPs and their local partners should clearly define their respective roles and workflows to support consistent HMIS reporting. Separate from HMIS reporting requirements, and similar to other Medi-Cal benefits, MCPs are responsible for maintaining the authoritative record of each Member's Transitional Rent utilization, including paid months or partial months, interruptions in assistance, and remaining benefit, through applicable processes.[9] HMIS enrollment data does not replace this record.

[9] See the DHCS Community Supports Guide Volume 2 for more details.

Table 2. Transitional Rent HMIS Roles and Responsibilities

MCPs	CoCs/ HMIS Leads	Providers
» Accountable for ensuring all instances of Transitional Rent that they cover/pay for are recorded in HMIS beginning January 1, 2027. » May record instances of Transitional Rent into HMIS directly or may delegate responsibility for recording Transitional Rent into HMIS to providers.	» Configure HMIS projects and workflows consistent with DHCS and Cal ICH guidance. » Coordinate with providers and HMIS vendors to operationalize Transitional Rent reporting requirements.	» Confirm eligibility and coordinate service for Members receiving Transitional Rent. » May be responsible for recording Transitional Rent into HMIS based on arrangement with MCP.

Timeline for Compliance

MCPs must make best efforts to ensure that all instances of Transitional Rent are recorded in HMIS. While MCPs should strive to ensure that all instances of Transitional Rent are recorded in HMIS from the date of launch onward, HMIS entry is not required until January 1, 2027.[10] MCPs and providers are not expected to retroactively enter Transitional Rent provided before January 1, 2027. However, they are accountable for ensuring all instances of Transitional Rent that they cover/pay for from January 1, 2027, forward are recorded in HMIS.

DHCS may use data from CoCs' HMIS uploads to HDIS to assess compliance with the HMIS reporting and project setup requirements in this document. HDIS will not be used as the authoritative source for validating a Member's cumulative six-month Transitional Rent utilization.

Overview of Transitional Rent Setup Process

Transitional Rent must be recorded through a separate Transitional Rent-specific HMIS project. The following steps outline the sequence of actions that MCPs and/or providers should take to achieve compliance with Transitional Rent HMIS requirements. Client enrollment and exit dates in the Transitional Rent-specific project must correspond to the period during which the Member receives the Transitional Rent benefit. Each step is

[10] See page 75 of the DHCS Community Supports Policy Guide Volume 2.

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described in detail in the sections that follow. Because HMIS project setup requires coordination with your local HMIS Lead, we recommend contacting them as early as possible.

1. **Identify Responsible Organizations.** Identify the organizations associated with each of your Transitional Rent projects that are responsible for data collection and quality assurance.
2. **Contact Your HMIS Lead.** Find your HMIS Lead and contact them as early as possible.
3. **Connect Organizations to HMIS Lead**. Ensure each organization is aware of its Transitional Rent HMIS responsibilities and connect them to the HMIS Lead.
4. **Prepare Providers on HMIS reporting.** Train providers on Transitional Rent HMIS reporting requirements, including how to appropriately enroll and exit Members from Transitional Rent-specific HMIS projects.
5. **Set Up New HMIS Projects.** Set up Transitional Rent-specific projects including Project Descriptor Data Elements, Transitional Rent funding source information, bed/unit inventory, and configure privacy controls. See appropriate sections in guidance for Project Setup, Project Descriptor Data Elements, and Data Privacy.
    a. **Determine Project Types.** Identify the correct HMIS project type, using Table 3 below, based on allowable housing settings and the eligible population served, including whether Members are experiencing or at risk of homelessness.
    b. **Determine Continuum Project Status.** Determine whether each project qualifies as a Continuum Project (Yes/No). See Continuum Project section for more details.
    c. **Enter Client-Level Data.** Manage enrollment and exit dates for each client in Transitional Rent-specific projects to align with client's duration of Transitional Rent benefit.

Project Setup

HMIS projects must be set up before client-level data elements can be entered into HMIS. Project Descriptor Data Elements (PDDEs) are fields in the HUD Data Standards Manual that identify the organizations, specific projects, and details of the projects in which clients are enrolled.

MCPs and providers should work with their HMIS Lead agencies to ensure their projects' PDDEs align with both the HUD Data Standards Manual and the below requirements. Depending on the HMIS implementation, PDDEs are entered either by the

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MCPs/providers, or the HMIS Lead in consultation with the MCPs. A template to gather the required project information is included in Appendix A of this document.

To support consistent statewide reporting and project identification, Transitional Rent may be recorded in one or more dedicated Transitional Rent HMIS project(s). A separate Transitional Rent project in HMIS may be set up when differences in the intervention, Project Type, population served, housing configuration, or other required PDDEs necessitate a distinct HMIS project configuration (see more details in Project Descriptor Data Elements (PDDEs) Project Type section).

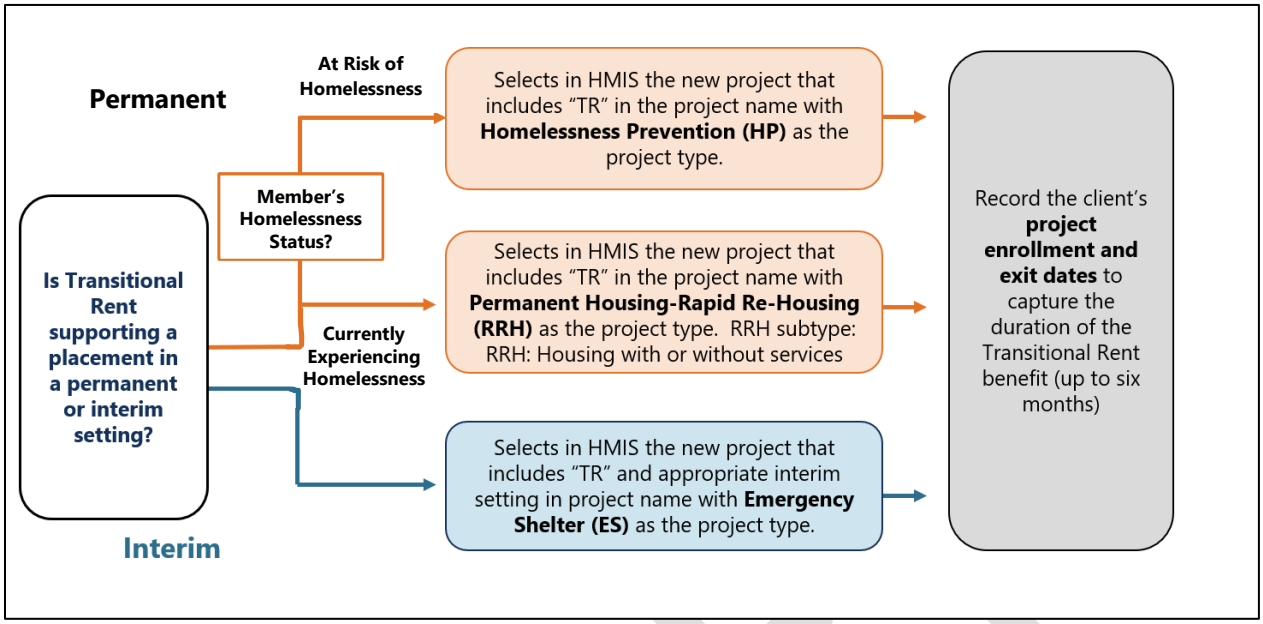
HMIS Project Enrollment Journey

HMIS is designed to document an individual's interactions with homelessness response services over time. A client's HMIS record may include one or more project enrollments, each representing participation in a specific program and period of service. HUD requires CoCs to collect and update information throughout this enrollment journey, including at project entry, during interim updates when important information changes (e.g., connection to a new project or change in eligibility), and at project exit. This record helps document an individual's homelessness history, service utilization, housing outcomes, and eligibility for programs and resources.

Project Descriptor Data Elements (PDDEs)

This section describes each PDDE with data entry instructions for Transitional Rent-specific projects. Transitional Rent projects are expected to align with the HMIS Project Type that best reflects the actual intervention, housing setting, and population served. MCPs and providers should work with their HMIS Lead to determine the appropriate Project Type based on the characteristics of the project. As applicable, Emergency Shelter (ES), Rapid Re-Housing (RRH), and Homelessness Prevention (HP), are expected to be the most common Project Types used for Transitional Rent where the applicable HUD definition and the characteristics of the project are met. An illustrative overview of the project setup for Transitional Rent is illustrated in Figure 1.

Figure 1. Illustrative Approach for Entering Transitional Rent into HMIS



Why is a Separate Transitional Rent Project Needed?

HMIS funding-source information is recorded at the project level and therefore may not distinguish which clients within a braided-funding project received Transitional Rent. Locally configured member-level funding fields are not included in the standardized HUD HMIS CSV transmitted to HDIS. These instructions therefore use Transitional Rent-specific projects to support consistent statewide identification of Transitional Rent participation through standardized HMIS data.

Enrollment and exit dates should correspond to the period represented by the Transitional Rent project. These data may support statewide reporting on Transitional Rent participation, but HDIS is not the authoritative system for administering or validating a Member's cumulative six-month benefit. MCP and DHCS program-administration data remain the source for that purpose.

Project Name: Create a new HMIS project and assign a descriptive Project Name that clearly identifies the project and is recognizable to providers, MCPs, and HMIS Leads. Include the term "**TR**" in the Project Name to support project identification and reporting. When a Member is receiving Transitional Rent in a setting that is already represented by an active HMIS project enrollment, the Transitional Rent project name should generally mirror the name of the previous housing project, with the addition of "TR" to distinguish it from the existing enrollment. For example, a project named

"Example County Flex Pool Subsidy" could be recorded as "Example County Flex Pool Subsidy - TR."

Project Type: In HMIS, every setting must be assigned a single Project Type, which serves as a standardized classification identifying the type of housing, shelter, or services that a project provides.[11] A project may only be assigned one Project Type, although clients may enroll in multiple projects over the course of their housing journey.

For Transitional Rent, Project Type selection requires consideration of both the Member's **housing setting and homelessness status.** Transitional Rent is available to Members who are experiencing homelessness as well as those who are at risk of homelessness, following the DHCS definition of homelessness.[12] This distinction is important for Members receiving Transitional Rent in permanent housing because HUD distinguishes between projects serving people experiencing homelessness and those serving people at risk of homelessness. HUD-defined HMIS Project Types and the related settings and eligible populations for Transitional Rent are provided in Table 3 (organized by HMIS project type). As a reminder, certain housing types may function as either permanent or interim housing depending on the characteristics of the arrangement. A housing arrangement is considered permanent when the Member has a renewable lease agreement. Where there is no lease agreement, or the lease is not renewable, the setting is considered interim.[13]

In summary:

- **Interim settings:** The HMIS Project Type must reflect the actual intervention and housing arrangement. An interim placement that functions as temporary shelter may be recorded as Emergency Shelter (ES). MCPs and providers should work with their HMIS Lead to determine the appropriate Project Type based on the characteristics of the project.
- **Permanent settings for individuals who are experiencing homelessness:** Transitional Rent must be recorded using a residential project type that reflects

[11] HUD's Project Information data element (2.02) requires communities to assign a Project Type during project setup because project type drives data collection requirements, reporting, system functionality, and how client enrollments are recorded over time. See the FY 2026 HUD HMIS Data Standards.

[12] Members must meet the HUD definition of homeless or at risk of homelessness, as defined in Section 91.5 of Title 24 of the Code of Federal Regulations (CFR), with three additional modifications as defined in Appendix C of the DHCS Community Supports Guide Volume 2.

[13] A complete description of allowable settings is available in the DHCS Community Supports Policy Guide Volume 2 Section VII.C.

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the housing assistance provided. Placements in permanent housing may be recorded as **Permanent Housing – Rapid Rehousing** when the individual is experiencing homelessness. Select **RRH subtype: RRH: Housing with or without services**. Under the FY 2026 HMIS Data Standards, the RRH **Housing with or without services** subtype must be selected when a project provides any ongoing rental funds. A housing arrangement is considered permanent when the Member has a renewable lease agreement.

- ***Note:*** The **Services Only** subtype applies only when all ongoing housing assistance for all project participants is provided through another funding source. Similarly, the **Supportive Services Only** (SSO) project type is limited to projects that provide supportive services rather than housing or rental assistance. As Transitional Rent directly funds rental assistance, Services Only and SSO cannot be used.

» **Permanent settings for individuals who are at risk of homelessness**: Placements in permanent housing may be recorded as **Homelessness Prevention (HP)** when the individual is at risk of homelessness.

Distinguishing between Transitional Rent participants who are at risk of homelessness and those who are experiencing homelessness is important for maintaining consistency in HMIS and state and federal reporting. Incorrect project setups may jeopardize CoC's ability to produce accurate, reliable reports such as the System Performance Measures (SPM) and the Longitudinal Systems Analysis (LSA). This approach is consistent with the structure used for the Department of Veterans Affairs Supportive Services for Veteran Families (SSVF) program which serves veteran families and individuals who are homeless or at-risk of homelessness without SSVF assistance.[14]

Considerations for PSH Prioritization

Selection of an HMIS Project Type should reflect the actual intervention and housing setting and should not be used for the purpose of establishing a Member's homelessness or chronic homelessness status.

Under HUD requirements, time spent in an Emergency Shelter may count toward the living-situation requirements for determining chronic homelessness. Other residential settings, including Transitional Housing, may be treated differently under applicable HUD eligibility requirements. For the purposes of determining chronic homelessness, Transitional Housing is not an emergency shelter, safe haven, or place not meant for

[14] For more details see: VA-Programs-HMIS-Manual.pdf

human habitation. Accordingly, a stay in Transitional Housing may constitute a break in the period used to establish chronic homelessness.

MCPs, providers, and HMIS Leads should select the Project Type that accurately represents the project rather than selecting a type for purposes of preserving eligibility for another housing program.

Continuum Project

A "Continuum Project" is a specific HMIS data field — it does not refer to a CoC organization, CoC membership, or a continuum of services. Per HUD's HMIS Data Standards, a Continuum Project is a distinct unit of an organization whose primary purpose is to provide services and/or lodging for individuals and families experiencing or at-risk of homelessness, and that is identified by the Continuum as part of its service system. The primary purpose of this field is to support completion of the Housing Inventory Count (HIC) data submitted to HUD.

Most projects created under AB 977 should be set up as Continuum Projects (Continuum Project = "Yes"). There are a few exceptions where a project may need to be classified for state reporting or monitoring purposes in a way that does not align with HMIS Data Standards project type definitions. In these instances, the project should be set up with Continuum Project = "No".

This designation affects how the project is treated for applicable HUD and system-level reporting. HMIS Leads should follow the specifications for each applicable HUD report when determining whether and how a project is included.

General examples of projects that would be set up as Continuum Project = "No":

- **Permanent housing, which is limited to people who are at-risk of homelessness:** A county operates a Permanent Housing with Services project that exclusively serves clients who are at-risk of homelessness (cannot serve clients currently experiencing homelessness). Because the project does not serve clients experiencing homelessness (Categories 1, 2, and 4 of the federal homeless definition), it does not qualify as a Continuum Project.
- **Projects not aligned with HMIS Data Standards but required for state reporting**: A project that must be tracked for state reporting or monitoring purposes but does not align with HMIS Data Standards project type definitions should be set up as Continuum Project = "No". This ensures it can still be tracked at the state level without being included in HUD reporting. This should be used

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minimally and only when standard HMIS project classifications cannot appropriately reflect the activity.

Bed and Unit Inventory: All residential projects must record bed and unit inventory in HMIS; this must represent the total number of units and beds that are available for the clients enrolled in that specific HMIS project and are reported by household type (Adults with Children, Adults without Children, and Child Only households).

For projects that operate with rental assistance or hotel/motel vouchers instead of a set number of units, bed and unit inventory is the maximum number of people and households that could be housed on a single night. For projects without a fixed number of beds, units, or vouchers, providers should estimate based on the average number of people and household types that are housed each night. Projects that serve more than one household type and do not dedicate a specific number of beds or units to any one household type should estimate the number of beds and units by household type by their average usage. For more information on recording bed inventory in HMIS, please see section 2.07 Bed and Unit Inventory Information in the FY 2026 HMIS Data Standards

For Transitional Rent-specific projects:

- If a Transitional Rent project serves any Members currently **experiencing homelessness and the beds or units are not already represented** in an existing HMIS project, the Transitional Rent-specific project should be set up with **Continuum Project = "Yes."**
- If a Transitional Rent project serves any Members currently **experiencing homelessness and the same beds or units are already represented** in an existing HMIS project, the Transitional Rent-specific project should be set up with **Continuum Project = "No"** to avoid double counting the same inventory in the HIC.

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Table 3. HMIS Project Type

HMIS Project Type	HUD Client Eligibility Restrictions	Transitional Rent
Emergency Shelter (ES): Entry/Exit (EE) Note: ES:EE records a single enrollment with a start and exit date, used when a client has a defined stay (e.g., a hotel placement or interim housing unit). **Continuum Project Considerations:** If there is **no existing** HMIS project associated with the same beds or units: Continuum Project = "Yes" If the same beds or units are already associated with an **existing** HMIS project: Continuum Project = "No"	People experiencing homelessness.[15]	Transitional Rent for people who are experiencing homelessness or at risk of homelessness that is temporary and where there is no lease agreement, or the lease is not renewable. » Single room occupancy (SRO) units » Tiny homes » Hotels/motels when serving as the Member's primary residence » Interim settings with a small number of individuals per room (not large dormitory sleeping halls) » Transitional and recovery housing with no lease agreement, including: » Bridge, site-based, population-specific, and community living programs that may or may not offer supportive services and programming » License-exempt room and board » Peer respite
Homelessness Prevention (HP) **Continuum Project Considerations:** Continuum Project = "No"	People at risk of homelessness[16]	Transitional Rent for people who are **at risk of homelessness** in a housing arrangement where the Member has a **renewable lease agreement**. » Single-family and multi-family homes (e.g., duplexes) » Apartments » Housing in mobile home communities

[15] HUD considers time spent in an emergency shelter to be time experiencing homelessness for purposes of determining chronic homelessness. See HUD, Definition of Chronic Homelessness.
[16] See HUD definition of at risk of homelessness as defined in Section 91.5 of Title 24 of the Code of Federal Regulations (CFR).

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HMIS Project Type	HUD Client Eligibility Restrictions	Transitional Rent
		» Accessory dwelling units (ADUs) » Shared housing—where two or more people live in one rental unit » Project-based or scattered site permanent supportive housing » Single room occupancy (SRO) units » Tiny homes » Recovery housing » License-exempt room and board
Permanent Housing (PH) – Rapid Re-housing (RRH) <u>RRH subtype:</u> RRH: Housing with or without services[17] **Continuum Project Considerations:** If there is **no existing** HMIS project associated with the same beds or units: Continuum Project = "Yes" If the same beds or units are already associated with	People experiencing homelessness at entry[18]	Transitional Rent for people who are **experiencing homelessness** in a housing arrangement where the Member has a **renewable lease agreement**. » Single-family and multi-family homes (e.g., duplexes) » Apartments » Housing in mobile home communities » Accessory dwelling units (ADUs) » Shared housing—where two or more people live in one rental unit » Project-based or scattered site permanent supportive housing » Single room occupancy (SRO) units » Tiny homes » Recovery housing

[17] As described on pages 25-26 of the HMIS Data Standards Manual: "The 'Housing with or without services' subtype must be selected if the project receives any ongoing rental funds, even if not all project participants receive housing assistance funds from the RRH project. Only select the 'Services Only' subtype if the ongoing housing assistance for all program participants is provided by another funding source (e.g., Housing Choice Voucher, HUD-VASH, other RRH project)."

[18] Note: Individuals in RRH are considered chronically homeless for purposes of remaining eligible for permanent housing placements dedicated to serving the chronically homeless. For more information, see https://www.hudexchange.info/faqs/530/is-an-individual-or-family-that-is-receiving-rapid-re-housing-assistance/

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HMIS Project Type	HUD Client Eligibility Restrictions	Transitional Rent
an **existing** HMIS project: Continuum Project = "No"		» License-exempt room and board

Funding Source

Providers must enter the standardized Transitional Rent funding source code. Please consult your HMIS Lead for assistance entering funding sources into the CoC's specific HMIS software.

- Funding Program: Select "**Local or Other Funding Source (Please Specify)**" in the Funding Program field.
  - Other funder text box: Enter into the open text field or select from the picklist the code for Transitional Rent: **CA-DHCS-TR**.

For projects that receive funding from more than one California state program subject to AB 977, the project must enter two separate funding source records with the correct Other Funder Code.

HMIS Data Entry When Transitional Rent Is Used With Other Funding Sources

Existing Funding Sources. When Transitional Rent replaces an existing funding source for an individual's housing, the individual should be exited from the existing HMIS project and enrolled in the Transitional Rent-specific project. The previous residential enrollment should not remain open during the period represented by the Transitional Rent project. During this period, the Transitional Rent-specific project represents the Member's residential stay in HMIS. Providers should manage project exit and enrollment dates so the Member is not concurrently enrolled in two residential projects for the same housing placement. When Transitional Rent ends, the Member should be exited from the Transitional Rent-specific project and, as applicable, enrolled in the project associated with the subsequent funding source.

Concurrent Funding Sources. DHCS recognizes that interim housing is often funded using a bundled per-diem rate that may include lodging, meals, case management, operational costs, and other supportive services. Under the Community Supports Policy Guide and the Behavioral Health Community-Based Organized Networks of Equitable Care and Treatment (BH-CONNECT) authorities, Transitional Rent can only be used to cover the cost of housing the Member in the interim setting. Food and supportive

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services are not covered by Transitional Rent and may instead be funded through BHSA, Behavioral Health Bridge Housing (BHBH), other non-Medi-Cal funding sources, or separately billable Medi-Cal services, as applicable. The applicable HMIS program guidance for the other funding source should be referenced for non-Transitional Rent project setup, enrollment, and funding source.

Sequential Funding Sources. Transitional Rent may function as a bridge subsidy while a Member transitions between housing settings or awaits the start of a longer-term housing subsidy. Because Transitional Rent is a time-limited benefit that can only be authorized for up to six months per eligible Member, providers may need to establish multiple HMIS enrollments to accurately document the Member's housing journey and use of the benefit.

For example, a Member may initially receive Transitional Rent in an interim housing setting, later move into permanent housing while continuing to receive Transitional Rent, and eventually transition to a longer-term housing assistance program such as BHSA Housing Interventions. In these circumstances, providers should maintain HMIS enrollments that accurately reflect the applicable housing setting, project type, funding source, and duration of the Transitional Rent benefit. Once Transitional Rent has been exhausted, the Member may be exited from the Transitional Rent project and enrolled in a separate project associated with the longer-term housing subsidy. The illustrative examples below are intended to support MCPs, HMIS Leads, and providers in understanding how changes in funding sources should be recorded in HMIS. Providers should refer to the applicable program guidance governing the ongoing funding source when establishing or enrolling a Member in a non-Transitional Rent project.

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Client-Level Data Entry Requirements

Client-level data should reflect the Member's actual living circumstances. When a new enrollment is required to identify the Transitional Rent as the applicable funding source, MCPs and providers should work with their HMIS Lead agencies to ensure their projects' PDDEs align with both the FY 2026 HMIS Data Standards. This includes the following required data elements for Transitional Rent, where applicable:

- Project Start Date
- Project Exit Date
- Prior Living Situation
- Exit Destination
- Housing Move-In Date
- Household relationships

Illustrative Examples



***Illustrative Example 1*:**

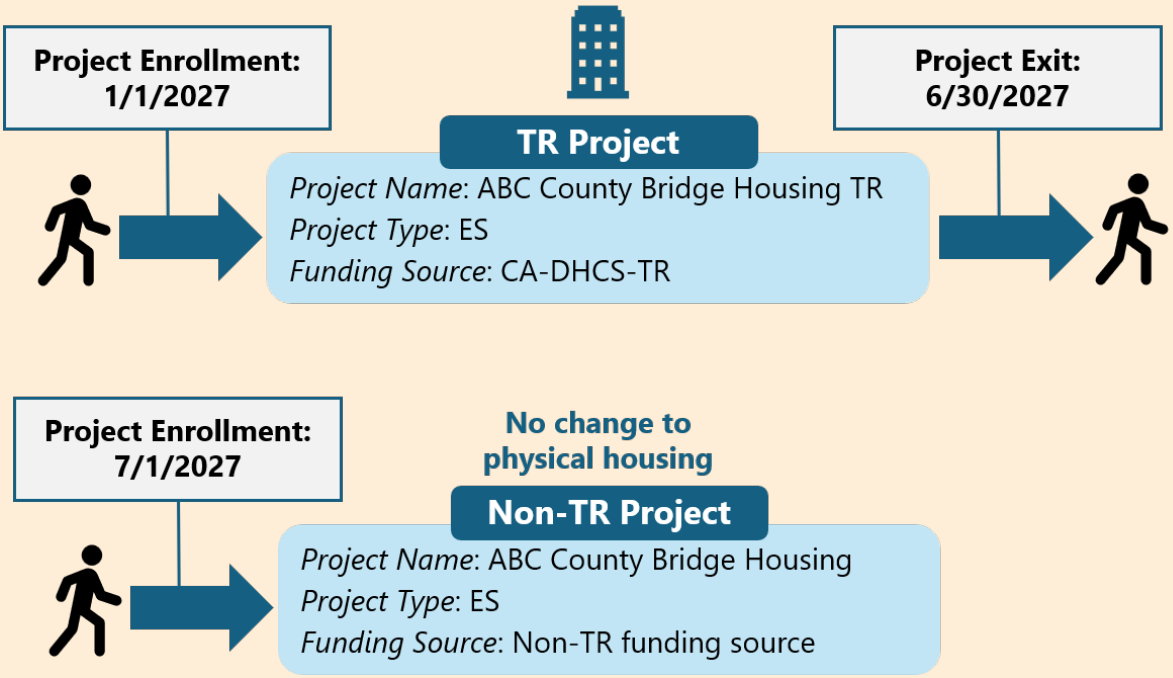
Transitional Rent Ends, Member Remains in the Same Interim Housing Setting

Scenario: A Member remains physically housed in the same setting after Transitional Rent ends and another funding source begins supporting the placement.

HMIS action: Exit the Member from the Transitional Rent project when Transitional Rent ends and enroll the Member in the applicable non-Transitional Rent project. The Member's physical housing placement does not change.

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Example Member Journey

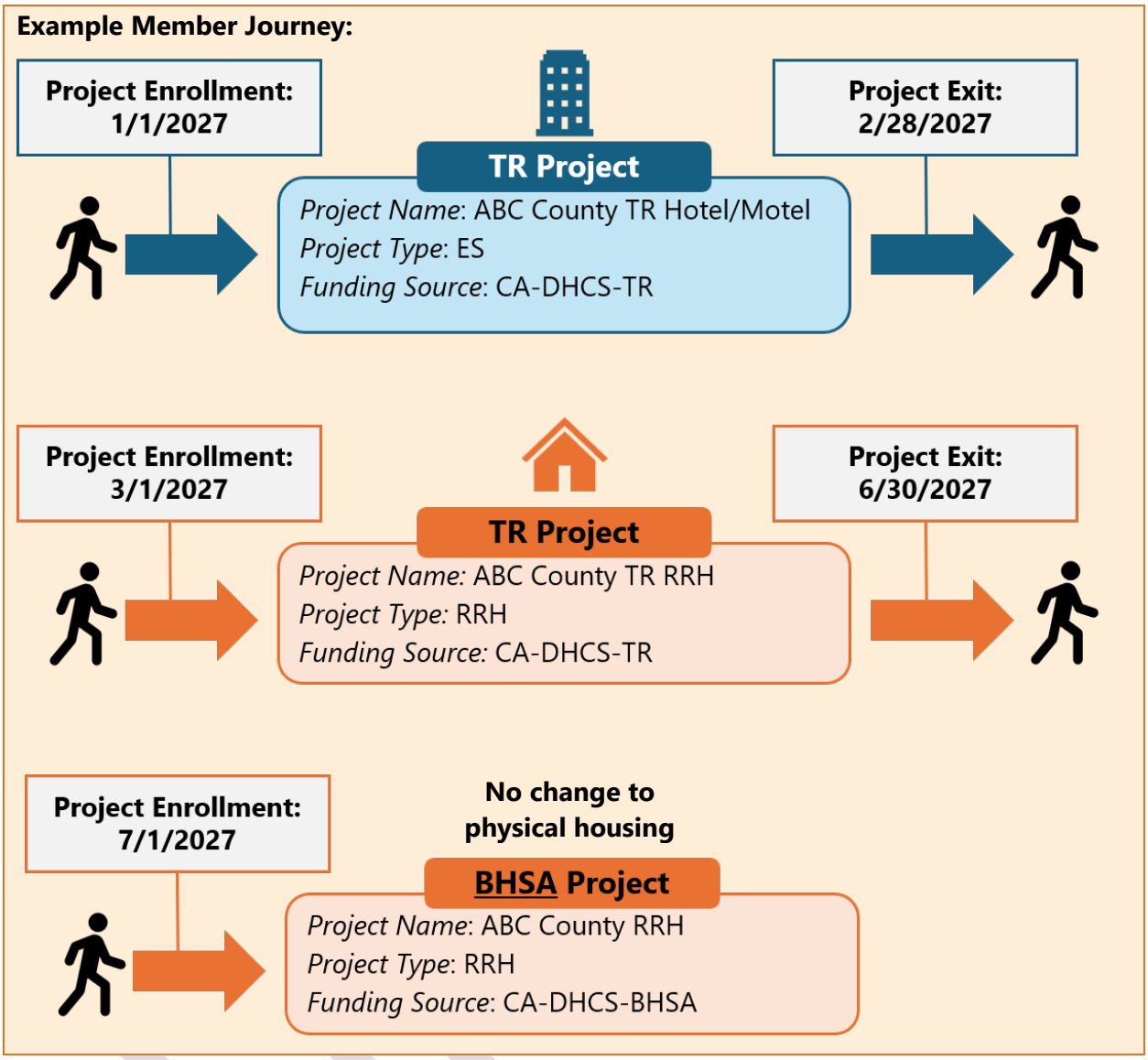


***Illustrative Example 2*:**

Transitional Rent from Interim to Permanent Housing, Followed by BHSA

Scenario: A Member receives Transitional Rent while staying in a hotel and later moves to permanent housing while continuing to receive Transitional Rent. When the Transitional Rent benefit ends, BHSA Housing Interventions begins supporting the Member in the same permanent housing unit. Each change in housing setting or funding source is reflected through the appropriate HMIS project enrollment, as illustrated below.

HMIS action: When the Member moves from interim to permanent setting using Transitional Rent, exit the Member from the interim setting Transitional Rent project and enroll the Member in the permanent setting Transitional Rent project. When Transitional Rent ends, enroll the Member in the applicable BHSA Housing Interventions project. The Member's physical housing placement does not change in this last step.



Data Sharing and Privacy

Data Exchange

HMIS serves as the community's system of record for homelessness services and housing interventions. MCP and other provider participation in HMIS is essential to ensure that HMIS maintains that system of record, while improving data quality, accountability, and care coordination.

MCP and provider access to or entry of HMIS information does not create an unrestricted right to use housing data. Information sharing remains subject to HUD HMIS privacy requirements, local CoC privacy notices, the Health Insurance Portability and Accountability Act (HIPAA), and other applicable state and federal laws. Examples of

information that may be shared to support Transitional Rent implementation include referral information, contact information, homelessness status, housing placement status, enrollment information, service coordination needs, and other information reasonably necessary to support housing-related care coordination and delivery.[19]

Confidentiality

While HMIS participation supports care coordination and reporting, entities must also implement appropriate privacy and confidentiality protections. The provider can use a closed HMIS project set up when necessary to protect client privacy or as required by local HMIS configuration, as long as data are included in the CoC's quarterly data uploads to the state's Homelessness Data Integration System. The provider should work with their HMIS Lead to request a closed project configuration; this is a local setup decision that must be coordinated in advance and documented in the project's setup template.

There may be specific cases where the provider is considered a victim service provider (VSP) and is therefore prohibited from participating in HMIS. VSP status is determined by whether the organization's primary mission is to serve victims of domestic violence, dating violence, sexual assault, or stalking. Reporting Entities that believe they may qualify as VSPs should consult with their HMIS Lead and legal counsel before entering any client-level data into HMIS.

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[19] For information on how HIPAA applies in more specific care delivery contexts, see the DHCS Data Sharing Authorization Guidance Medi-Cal Housing Services Toolkit; U.S. Department of Housing and Urban Development, "2004 HMIS data and technical standards final notice. HUD Exchange," available at: https://www.hudexchange.info/resource/1318/2004-hmis-data-andtechnical-standards-final-notice/.

REQUEST FOR STAKEHOLDER FEEDBACK

DHCS is seeking stakeholder input on this draft guidance before it is finalized. **Stakeholders may submit comments, questions, and recommended revisions using the Transitional Rent HMIS Guidance Public Comment Form** (linked: https://forms.cloud.microsoft/r/1RF5bUL5BT). Please submit feedback by **December 2, 2026**, and identify the relevant section of the guidance where applicable.

DHCS is seeking feedback on the guidance, in particular:

1. Does your organization or CoC/HMIS lead anticipate any significant challenges with implementing the proposed approach of setting up separate Transitional Rent-specific projects in HMIS? If yes, please describe the challenge and any alternative approach you recommend.
2. Are there specific CBOs or provider types that would face practical barriers to implementing the Transitional Rent HMIS requirements? Please identify the organization (if available) or the provider type and describe the specific barriers. For example, lack of HMIS access, licensing costs, staffing capacity, or working across multiple CoCs with different requirements.
3. For the barriers identified, what would need to change to make implementation feasible and whose action would be required. Please distinguish issues within your control/that your organization can address versus those that may need action from DHCS, MCPs, CoCs HMIS Leads, or system vendors.
4. Approximately how many Transitional Rent-specific HMIS projects would your organization expect to establish under this guidance? What factors would most affect that number (for example, housing settings, providers, MCPs, CoCs, or populations served)? Are there circumstances in which the guidance would require multiple Transitional Rent-specific projects that you believe could reasonably be combined? Please describe.
5. Does the proposed approach involve risks of duplicative HMIS projects, enrollments, or data entry? If so, what are they and how could these risks be mitigated or avoided?
6. Are any additional clarifications needed to make the appropriate HMIS project setup and Continuum Project designation clearer?

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7. Do the guidance and illustrative examples provide sufficient direction for recording changes in housing setting or funding source during a Member's Transitional Rent benefit? What additional scenarios, if any, should DHCS address?
8. Are the respective responsibilities of MCPs, providers, CoCs, and HMIS Leads sufficiently clear? If not, please identify areas where additional clarification is needed.
9. What additional examples, tools, templates, or technical assistance would be most helpful to support implementation of these requirements?

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APPENDIX A: PROJECT SETUP TEMPLATE

Reporting Entities can use the template below to gather information in preparation for a conversation with the local HMIS Lead. This template is provided for reference; each HMIS Lead may require you to use their own locally adopted form for collecting project information.

The descriptions below are not intended to supplant official guidance from HUD on the proper use of a CoC's HMIS. For more details, please refer to the HMIS Data Standards Manual and the Project Setup and Data Entry Requirements section.

Project Descriptor Data Element	Description	Project Response
Organization Information		
Organization Name	The legal name of the organization or agency operating project; Reporting Entities can provide a legal and a "common" name in the system, if there is another name that is more useful to the community. Projects funded or operated by a service provider, should enter the name of the service provider organization.	
Victim Service provider	Indicate "yes" if this organization is a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.	
Project Information		
Project Name	Include the term "TR" in the Project Name to support project identification and reporting. When a Member is receiving Transitional	

Project Descriptor Data Element	Description	Project Response
	Rent in a setting that is already represented by an active HMIS project enrollment, the Transitional Rent project name should generally mirror the name of the previous housing project, with the addition of "TR" to distinguish it from the existing enrollment.	
Operating Start Date	Date project began providing services and/or housing. This should match the date the first client was served in the project and can be in the future if the project has not yet started serving clients.	
Operating End Date	Leave blank until project ceases providing services and/or housing to clients	
Continuum Project	If a Transitional Rent project serves Members experiencing homelessness and the same beds or units are already represented in an existing HMIS project, the Transitional Rent-specific project should be set up with Continuum Project = "No" to avoid double counting the same inventory in the HIC. If a Transitional Rent project serves Members experiencing homelessness and the beds or units are not already represented in an existing HMIS project, the Transitional Rent-specific project should be set up with Continuum Project = "Yes."	

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Project Descriptor Data Element	Description	Project Response
Project Type	Refer to Project Setup Section to select the most appropriate anticipated project type.	
[If PH – Rapid Re-housing] Identify RRH subtype	Indicate the RRH project is: RRH: Housing with or without services.	
[If Services Only for "Project Type" or RRH: Services Only subtype] Affiliated with a residential project	N/A	
Housing Type	Indicate if the project is 1) site-based at a single location, 2) site-based in various locations, or 3) tenant-based	
Continuum of Care Location Information		
Project Street Address	Enter the address of the project; for multi-site projects, enter the address in which most of the project's clients are housed. Tenant-based projects enter the administrative address. Note that if a project is identified as a Victim Services provider, only the ZIP field is required.	
Project City		
Project State		
Project Zip Code		
Funding Sources (select all funding sources that apply to each project)		

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Project Descriptor Data Element	Description	Project Response
Funder Program and Components	Select "Local or Other Funding Source" from the dropdown menu. This field is a "many to one" to a project, so if there are multiple funding sources to track, HMIS software should accommodate that type of setup. In other words, a separate project is not required for each funding source.	Local or Other Funding Source
If other, specify	Enter the Other Funder Code for Transitional Rent	CA-DHCS-TR
Grant Identifier	Leave blank	
Grant Start Date	Record the start date of the applicable Transitional Rent funding period for the project.	
Grant End Date	Record the end date of the applicable Transitional Rent funding period for the project. Leave blank while that funding period remains open, consistent with Cal ICH instructions. Do not use an individual Member's benefit exhaustion date.	
Bed and Unit Inventory (ES, TH, SH, PSH, RRH: Housing with or without services project types, and other PH only; RRH: Services Only does not enter	Enter the number of units and beds available for occupancy on a typical night. Projects that do not have a fixed number of beds can be estimated based on the average household size. Projects that use vouchers or tenant-based rental assistance should estimate based on the capacity needed for the average number of clients served. Beds must be separated out by the Household (HH) Type served (a separate number for HH with Adults and Children, HH without Children, and HH with Only Children). These numbers can be	

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Project Descriptor Data Element	Description		Project Response
inventory data.)	estimated based on average household sizes for projects that serve multiple household types. Projects also must report the number of these beds that are dedicated to any of the indicated population groups: Veterans, Youth, or Chronically Homeless (or any combination thereof). A dedicated bed is a bed that **must** be filled by a person in the subpopulation category (or a member of their household) unless there are no persons from the subpopulation who qualify for the project located within the geographic area.		
Enter beds and units for each household type (based on average or typical clients served)	Adults with Children (At least one member 18+ and at least one member under 18)	Adults without Children (All household members 18 or older)	Child only (All household members under 18)
Total Units			
Total Beds			
Dedicated Beds (subset of total beds above):			
Chronically homeless (CH) veterans			
Youth veterans			
Any other veterans			
CH youth			
Any other youth			
Any other CH			

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APPENDIX B: RESOURCES

The resources listed below provide additional information on Community Supports Transitional Rent policy requirements, HMIS project setup, and data sharing considerations. Organizations should consult these resources, as applicable, when implementing the guidance described in this document.

- Community Supports Policy Guide Volume 2
  The DHCS Community Supports Policy Guide provides detailed policy guidance on Transitional Rent, including eligibility requirements, allowable settings, covered services, reporting expectations, and implementation requirements for MCPs. Organizations should refer to the Community Supports Policy Guide for comprehensive policy requirements related to the Transitional Rent benefit.
- BHSA HMIS Project Setup Instructions
  The BHSA HMIS Project Setup Instructions provide guidance on HMIS project configuration, funding source entry, project naming conventions, and reporting requirements for BHSA-funded projects. Organizations may find this resource particularly helpful when recording Transitional Rent alongside BHSA funding sources or when establishing projects that include multiple funding streams.
- Data Sharing Authorization Guidance (DSAG)
  The Data Sharing Authorization Guidance (DSAG) provides information on privacy, consent, and data-sharing considerations for housing and health-related data exchange. Organizations should consult the DSAG when developing processes for sharing information across MCPs, Housing Trio Providers, Transitional Rent Providers, HMIS Leads, and other partners.
- DSAG Medi-Cal Housing Support Services Toolkit
  The DSAG Medi-Cal Housing Support Services Toolkit includes practical tools, sample workflows, and implementation resources to support coordination among housing and health care partners delivering Medi-Cal housing supports. The toolkit may be particularly useful for organizations developing operational processes related to referrals, care coordination, data sharing, and documentation of housing-related services.