Understanding ISL for Housing Providers

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Why counties will need individual-level housing service and expense information

What is changing for counties, what is not changing for counties, and how housing providers can prepare

THE MOST IMPORTANT SLIDE IN THIS DECK

Local Instructions Will Come from the County

This presentation explains the statewide ISL concept. Each county will determine its local implementation approach.

- The county may establish provider documentation, submission, or workflow expectations.
- Providers should not change current practices solely because of this presentation.
- Questions about local expectations should be directed to the provider's contracted county.

Follow the instructions issued by your contracted county.

BEFORE WE BEGIN

This Training Is Informational

What This Training Does

- Provides a plain-language introduction to ISL
- Explains why counties must report qualifying individual-level services and expenses
- Describes the types of housing information counties may need
- Helps providers recognize possible future implementation questions

What This Training Does Not Do

- Establish local provider requirements or documentation standards
- Amend county contracts or policies
- Direct providers to adopt a particular workflow
- Replace instructions issued by the contracted county

✓ *Your contracted county will determine what information, documentation, and workflow may be required locally.*

WHAT WE'LL COVER

Three Key Learning Objectives

1

What ISL is and why counties must report it

A plain-language explanation of the statewide reporting requirement.

2

What housing information counties may need

Examples of information that may support county reporting.

3

How housing services and expenses fit the ISL structure

A conceptual overview, not local implementation instructions.

ISL IN PLAIN LANGUAGE

ISL Helps the State Understand County Non-Medi-Cal Services

Why DHCS Created ISL

- ISL is a reporting requirement under the Behavioral Health Services Act (BHSA)
- DHCS already receives Medi-Cal claims data that tells the story of Medi-Cal services delivered to individuals.
- County behavioral health housing and related services are generally not captured through Medi-Cal claiming.
- ISL gives DHCS visibility into qualifying non-Medi-Cal services and expenditures tied to identifiable individuals.
- This helps the state better understand county behavioral health investments, utilization patterns, and the individuals served.

This will be collected through ISL Encounter Reporting

Housing service or expense tied to an identifiable individual + **Not reported through Medi-Cal** + **Within the county behavioral health delivery system** = **Potential ISL encounter**

Housing data is especially important

- The state is investing heavily to address homelessness and wants to know what those funds provide.

SETTING EXPECTATIONS

What ISL Changes for Counties

What Is Changing for Counties

- Counties must report qualifying individual-level services and expenses
- Counties must establish processes for collecting required ISL encounter information
- Counties may need additional detail from housing providers, above and beyond what is currently being provided
- Counties will determine what, if any, additional information from its providers is necessary and the applicable local workflow

What ISL Does Not Change by Itself

- ISL does not create a new benefit for individuals
- ISL does not create a new payment from DHCS
- ISL does not require providers to deliver new services; rather, it is simply capturing what is already being done
- Existing county contracts and local instructions continue to govern provider responsibilities

✓ *ISL is intended to provide visibility into qualifying services and supports that are already being delivered.*

Providers Hold Information Counties May Need

1

Providers are where the services occur

Providers may hold information about housing stays, supports, expenses, occupancy, or other housing activity that is not currently being reported to the county behavioral health agency, or is reported in a form the county cannot use. For example, it may appear on fiscal invoices that do not translate into health records.

2

Counties hold the reporting responsibility

Counties determine which activities qualify and submit reportable encounters to DHCS. It is therefore through the county's contract and established policies that govern provider expectations around documentation and reporting to the county.

3

What providers can do to prepare now

A good first step is taking inventory of where housing stay, support, expense, occupancy, and invoice information currently resides within the organization.

Understanding the Informational Needs of the County Starts with a Tour of the Housing-Related ISL Codes

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Housing Codes at a Glance

Category	Codes	Unit
Board & Care Patches	ISL200 to ISL204	Day
Housing Stays & Placement Holds	ISL205, ISL210, ISL212 to ISL216	Day
Rental & Operating Subsidies, and Housing Cost Supplements	ISL206 to ISL209, ISL221, ISL222	Expense
Start-Up, Landlord & Other Costs	ISL211, ISL217, ISL218, ISL219	Expense
Housing Outreach & Engagement	ISL220	Minute

Use this series when...

- The county or program pays for or supports a client's housing placement, service, or expense
- The housing service or cost is not captured through Medi-Cal claiming

Draft educational content. Confirm code numbers, titles, units, and definitions against the final DHCS ISL Code Library before use.

Board & Care Patches (1 of 2)

Code	Unit	What it covers	Example
ISL200 Board and Care Patch Level 1	Day	Mild support board and care patch costs beyond the base fee, such as added support for medication prompts, redirection, counseling, or behavior modification.	A client needs basic verbal prompts and occasional redirection from facility staff.
ISL201 Board and Care Patch Level 2	Day	Moderate support patch costs beyond the base fee, such as medication prompts and some added nutrition, housekeeping, bathing, bedding, or laundry support.	A client needs medication prompts and extra housekeeping or laundry support in board and care.
ISL202 Board and Care Patch Level 3	Day	Enhanced support patch costs beyond the base fee, such as medication stand-by assistance, added daily living supports, occasional incontinence assistance, or periodic verbal aggression.	A client needs stand-by medication assistance and additional bathing or housekeeping support.

Code selection tips

- A patch is a supplemental payment that covers costs beyond the facility's base rate. Patch codes capture the added payment, not the room and board.
- Select the patch code based on the level of client support the patch covers.

Draft educational content. Confirm code numbers, titles, units, and definitions against the final DHCS ISL Code Library before use.

Board & Care Patches (2 of 2)

Code	Unit	What it covers	Example
ISL203 Board and Care Patch Level 4	Day	Intensive support patch costs beyond the base fee, such as observed medication support, incontinence management, frequent staff counseling or attention, or frequent verbal or physical aggression.	A client needs frequent staff attention and more intensive behavioral support to remain safely placed.
ISL204 Board and Care Patch Level 5	Day	Specialized supervision patch costs beyond the base fee, such as medication or behavior management, frequent direct care intervention, 1:1 or line-of-sight supervision, or added supervision for AWOL risk.	A client needs line-of-sight supervision to safely maintain placement.

Code selection tips

- Counties do not need five local board and care rate levels to use these codes. Choose the code that most closely aligns with the client's support level.
- These codes sit in the housing section because BHSA Housing Interventions include licensed board and care facilities. Still select codes based on the service or expense provided, not the funding source.

Draft educational content. Confirm code numbers, titles, units, and definitions against the final DHCS ISL Code Library before use.

Short-Term Housing Stays

Code	Unit	What it covers	Example
ISL205 Respite Residential	Day	Short-term, temporary behavioral health residential settings used as a step-down or diversion from a higher level of care that do not meet the standard for recuperative care.	The county pays for a short-term respite residential stay to help a client stabilize and avoid a higher level of care.
ISL210 Hotel/Motel Vouchers	Day	Temporary or short-term hotel or motel accommodations to prevent or address current homelessness.	The county provides a hotel voucher for a client who needs immediate lodging while longer-term housing is arranged.
ISL215 Shelter	Day	The cost of a client's shelter stay in a facility-based, temporary living arrangement.	The county pays for a client's short-term shelter stay while the client is experiencing homelessness.
ISL216 Shelter Plus Programming	Day	The cost of a shelter stay when additional day services or enhanced programming are included and not covered by Medi-Cal.	The county pays for a shelter stay that includes enhanced daytime programming to support housing stability.

Code selection tips

- Use the most specific setting code available, such as ISL210 for hotel/motel vouchers and ISL215/ISL216 for shelter settings.
- All day-based housing codes: report a separate daily encounter for each day of service, even if an invoice covers a longer date range.

Draft educational content. Confirm code numbers, titles, units, and definitions against the final DHCS ISL Code Library before use.

Recovery Residences & Placement Holds

Code	Unit	What it covers	Example
ISL212 Recovery Residence / Sober Living Interim Setting	Day	The cost of a client's stay in a recovery residence or sober living environment that is interim or time-limited.	The county pays for a temporary sober living stay while the client transitions from treatment to more stable housing.
ISL213 Recovery Residence / Sober Living Permanent Setting	Day	The cost of a client's stay in a recovery residence or sober living environment that functions as a permanent setting.	The county pays for an ongoing recovery residence stay that is not time-limited and includes a lease or tenancy structure.
ISL214 Housing Placement Hold	Day	The cost of reserving a client's housing placement when the client is temporarily absent, to maintain placement and continuity.	The county pays to hold a client's housing placement while the client is temporarily hospitalized.

Code selection tips

- Interim vs. permanent: permanent settings generally include tenant rights, such as a lease, and are not time-limited. Interim settings are time-limited or tied to program participation.
- Use ISL214 to hold a housing placement. Don't use the ISL100 treatment bed hold code when the placement is housing.

Draft educational content. Confirm code numbers, titles, units, and definitions against the final DHCS ISL Code Library before use.

Rental Subsidies

Code	Unit	What it covers	Example
ISL206 Rental Subsidy Interim Setting	Expense	The cost of housing an individual in an interim setting when it is not better captured by a more specific interim housing code. Supportive services are coded separately.	The county pays an interim rental subsidy for a client in temporary housing that is not respite residential, a hotel/motel, recuperative care, short-term post-hospitalization housing, or an emergency shelter.
ISL207 Rental Subsidy Permanent Setting	Expense	Rental subsidies in permanent housing, including scattered-site, project-based, master leasing, or shared housing, covering all or part of rent.	The county pays the difference between market rent and what a client can afford in a permanent housing unit.

Code selection tips

- Use ISL206 or ISL207 only when the subsidy is not better captured by a setting-specific code.
- Interim = temporary, transitional, or time-limited. Permanent = non-time-limited, supports ongoing tenancy (a renewable lease of at least one month).
- For a Medi-Cal member receiving Transitional Rent in an interim setting, use ISL206 for the non-Medi-Cal share of costs.

Draft educational content. Confirm code numbers, titles, units, and definitions against the final DHCS ISL Code Library before use.

Housing Services Cost Supplements

Code	Unit	What it covers	Example
ISL208 Housing Services Cost Supplement Interim Setting	Expense	A supplemental payment for an interim placement when non-specialty behavioral health housing-related service costs exceed available revenues and are not captured by another ISL code or billable to Medi-Cal.	Added supports in an interim placement, such as increased engagement, wellness and safety checks, housing problem-solving, or tenancy support, not included in the provider's base rate.
ISL209 Housing Services Cost Supplement Permanent Setting	Expense	A supplemental payment for a permanent placement when non-specialty behavioral health housing-related service costs exceed available revenues and are not captured by another ISL code or billable to Medi-Cal.	Added supports in a permanent placement, such as ongoing tenancy support, not included in the operating subsidy or rental assistance.

Code selection tips

- Cost supplements are not operating subsidies. Operating subsidies pay for the core operations needed to make a unit available. Cost supplements pay for the extra supports some clients need beyond that.
- Use the interim or permanent code based on the nature of the housing arrangement.

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Operating Subsidies

Code	Unit	What it covers	Example
ISL221 Operating Subsidy Interim Setting	Expense	Project- or site-level operating costs for an allowable interim setting, when reasonably attributable to an individual client using a documented allocation methodology.	The county allocates a portion of an interim housing site's monthly operating subsidy to a client based on a documented methodology.
ISL222 Operating Subsidy Permanent Setting	Expense	Project- or site-level operating costs for an allowable permanent setting, when reasonably attributable to an individual client using a documented allocation methodology.	The county allocates a portion of a permanent supportive housing site's operating subsidy to a client using a documented methodology.

Code selection tips

- Operating costs cover the day-to-day physical operation of housing (e.g., utilities, internet, maintenance, cleaning, security).
- Report these costs only when attributable to an identifiable client using a documented methodology.

Draft educational content. Confirm code numbers, titles, units, and definitions against the final DHCS ISL Code Library before use.

Start-Up & Other Housing Expenses

Code	Unit	What it covers	Example
ISL217 Moving Expenses, Furniture, or Other Household Goods	Expense	Moving expenses, furniture, or household goods needed to help a client establish a basic household, which are necessary for health and wellbeing.	The county pays for basic furniture and household items like food and hygiene products so a client can move into a new apartment.
ISL218 Security Deposits	Expense	Security deposits required to secure a rental unit, including additional deposit amounts that improve the chance of securing the unit.	The county pays a security deposit, including an additional deposit for repairs, so a client can move in.
ISL219 Other Housing Expenses	Expense	Other tenant-based supports that remove barriers to housing, such as ID documents, application or credit report fees, utility or pet deposits, tenant-paid utilities, storage fees, or rent and utility arrears.	The county pays a client's application fee, credit report, and utility deposit so the client can secure housing.

Code selection tips

- Use ISL219 only when the expense is not better captured by a more specific housing code.
- Use ISL219 for tenant-paid utilities. Use ISL221/ISL222 for building or landlord-paid utilities, as appropriate.
- Don't report start-up costs separately if they are already included in another reported housing rate or bundled payment.

Draft educational content. Confirm code numbers, titles, units, and definitions against the final DHCS ISL Code Library before use.

Landlord Outreach & Mitigation

Code	Unit	What it covers	Example
ISL211 Housing Landlord Outreach & Mitigation	Expense	Client-specific expenses that encourage or support a landlord's willingness to rent to or keep housing an individual, such as damage reimbursement, vacancy payments, eviction prevention costs, or other mitigation supports.	The county pays repair fees for damage a client caused to a unit (beyond usual wear and tear) to help the client keep housing and avoid eviction.

Code selection tips

- Use ISL211 only for supports directly tied to an identifiable client. General landlord recruitment or program-level outreach is not ISL reportable.
- If an expense covers multiple clients, report only the portion reasonably attributable to an identifiable client.

Draft educational content. Confirm code numbers, titles, units, and definitions against the final DHCS ISL Code Library before use.

Housing Outreach & Engagement

Code	Unit	What it covers	Example
ISL220 Housing Outreach & Engagement	Minute	Non-clinical outreach and engagement to locate, identify, and build relationships with individuals in unsheltered settings, to provide immediate support and connection to housing or related services. Includes staff travel during outreach, such as transporting a client to a shelter.	Housing outreach staff spend 30 minutes engaging an unsheltered client and connecting the client to housing navigation resources. The 30 minutes includes travel time related to the outreach activity.

Code selection tips

- ISL220 is minute-based, so it captures staff time rather than a housing expense.
- Community-level or encampment outreach not tied to an identifiable client is not ISL reportable.
- If the activity is clinical assessment, case management, or coordination that is appropriately captured by a Medi-Cal code, use the Medi-Cal code.

Draft educational content. Confirm code numbers, titles, units, and definitions against the final DHCS ISL Code Library before use.

What Providers can do now to Prepare

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POSSIBLE INFORMATION NEEDS

Examples of Information a County May Request

- ✓ **Individual identifier specified by the county**
- ✓ **Provider, facility, or site information**
- ✓ **Date or date range**
- ✓ **Housing setting or activity**
- ✓ **Days, minutes, or expense amount**
- ✓ **Invoice or supporting-record reference**
- ✓ **Other information required by the county**

! *This is not a universal provider checklist. Required information will depend on the county's approved workflow and current DHCS requirements.*

Caution: Do not send client information unless the county has provided an approved, secure submission method.

WHERE RELEVANT INFORMATION MAY ALREADY LIVE

Start with the Records and Workflows You Already Use

Examples of existing information sources

- **Placement and occupancy records**
- **Resident advisor or shift logs**
- **Housing support and service logs**
- **Invoices and payment records**
- **Expense receipts and assistance records**
- **Program, property, or case-management systems**

HOW YOU MIGHT SUBMIT

Examples of Data Collection Workflows Counties May Consider

A

Direct EHR entry

The county may provide system access, training, and workflow instructions.

B

Structured file or service import

The county may provide a standard spreadsheet or import template.

C

Enhanced invoice or supporting record

The county may request additional information through an existing administrative process.

✓ *These are just examples. The county will select and communicate the workflow.* ***Providers should follow the process approved by their contracted county****.*

ONE MONTHLY WORKFLOW

A County May Combine Payment and Reporting Workflows

Existing invoice process + **County-defined individual-level fields** = **Possible payment and reporting support**

A county may choose to integrate additional information into an existing invoice process, but local requirements and implementation timing will vary.

COMMON QUESTIONS

Are We Being Asked to Provide New Services?

SHORT ANSWER

No.

ISL is intended to help counties report qualifying services and expenses that are already being provided. A county may later request more structured information about those activities.

COMMON QUESTIONS

Does Every Interaction Need to Be Reported?

SHORT ANSWER

Not necessarily.

The county determines which services and expenses meet ISL requirements. Providers should follow the documentation and submission expectations communicated through the county's approved local process.

COMMON QUESTIONS

Do We Need Clinical Staff to Report Housing Activity?

SHORT ANSWER

Not always.

Relevant housing information may be maintained by resident advisors, housing staff, fiscal staff, program records, invoices, or occupancy records. The county will determine what information is needed, who should supply it, and how it should be transmitted.

COMMON QUESTIONS

Will ISL Change Our Payment?

SHORT ANSWER

ISL does not itself create a change to payment or reimbursement

Providers are not being asked to perform new services. Your county may ask that you update administrative workflows to support codifying existing services to conform to the county's ISL reporting requirements. The payment you receive continues to be governed by your county contract.

COMMON QUESTIONS

What Documentation Do We Keep?

SHORT ANSWER

Continue following existing requirements unless your county provides updated instructions.

A county may establish additional documentation or supporting-record expectations locally — examples of records that may contain relevant information:

- Occupancy or placement records
- Expense receipts
- Service logs
- Invoices
- Other locally required documentation
- Allocation support

LEARN MORE

Where Providers Can Learn More

DHCS has published resources on its ISL Reporting website, including:

1

ISL Encounter Reporting Guidance

The core DHCS guidance document for counties to follow.

2

ISL Code Library

The full list of ISL codes, definitions, and units.

3

ISL Encounter Fields

The data elements DHCS requires for each encounter.

4

ISL Frequently Asked Questions

DHCS's own answers to common questions.

✓ *These resources are oriented toward county agencies. They are being referenced for you as a provider so you may gain a deeper contextual understanding of ISL*

GETTING READY

How Providers Can Prepare for a County Conversation

- ✓ Identify where housing stay, service, expense, and occupancy information is maintained
- ✓ Identify the staff who understand current housing and invoice workflows
- ✓ Review what existing rates and bundled payments include
- ✓ Be ready to discuss secure information-sharing options
- ✓ Wait for county instructions before changing documentation or submission practices, and direct implementation questions to the contracted county

GETTING READY

Questions to Discuss with Your County

? Has the county established a provider implementation timeline?

? What housing information, if any, will the county request, and which provider records may contain it?

? Will existing invoice or reporting processes change?

? What secure method should be used if information is requested, and what documentation should providers maintain?

? Who is the county contact for ISL implementation questions?

The Goal Is Better Visibility, Not New Services

ISL will help counties show the qualifying housing services and supports delivered to individuals across the behavioral health system.

Your county will communicate any provider-specific expectations as its local implementation approach is developed.