Documenting Housing Status in Your Electronic Health Record

The Behavioral Health Services Act (BHSA) requires counties spend at least 30 percent of their BHSA funds on Housing Interventions, with 50 percent of that reserved for chronically homeless individuals (prioritizing those in encampments). Housing Intervention funds can be spent on clients experiencing homelessness and at-risk of homelessness.

To demonstrate compliance with the BHSA and prepare for future reporting under the Behavioral Health Outcomes, Accountability, and Transparency Report (BHOATR), counties need to standardize their tracking of clients' housing status. It is critical that counties are able to demonstrate that 100 percent of the clients receiving services funded with BHSA Housing Intervention meet the definitions of homeless or at risk of homelessness, and that 50 percent of that group meet the chronically homeless definition.

Two Methods to Document Housing Status in Your EHR

1. **Problem List** – The Department of Health Care Services (DHCS) requires county BHPs to create and maintain a problem list in their EHRs (see BHIN No: 23-068). The ICD-10 Z-codes address a client's homelessness status and housing inadequacy; three Z-codes are recommended for documenting experiencing homelessness and three for documenting at-risk of homelessness.

Action Required: Enter recommended ICD-10 Z59-series codes with a start date for homelessness status and update whenever the client's status changes. If the start date is unknown, estimate it from the client's report. See below for the six recommended Z codes.

2. **Flags or Special Populations** – The inclusion of Z59-series codes will allow the identification of clients who are homeless or at-risk of homelessness, but there is not a specific code for identifying chronic homelessness or living in an encampment. Counties should, therefore, also create flags to identify if a client is chronically homeless and/or living in an encampment with a start date, and update whenever the client's status changes. This will allow counties to track the number of chronically homeless individuals and the number living in encampments they are serving.

NOTE: *For the purposes of BHSA funding, a chronically homeless client maintains that status as long as they are placed in housing funded by BHSA Housing Interventions. Consider developing reports or other strategies based on an individual's housing status at housing program entry to ensure ability to capture housing status for funding purposes even if the person is no longer experiencing homelessness.*

Action Required: Within your EHR, create flags or special populations for chronically homeless clients (see definition below) and for those who are homeless and living in an encampment.

Key Definitions:

At-risk of homelessness: An adult or family is at-risk of homelessness if they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or another place cited in the homeless definition, and if they meet one of seven conditions:

- Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness assistance
- Being notified in writing that the right to stay in current housing ends within 30 days of applying for homelessness assistance
- Is living in the home of another because of economic hardship
- Is living in a hotel that is not paid for by a government agency or charitable organization
- Is exiting a publicly funded institution or system of care (such as a health care facility, a mental health facility, foster care or other youth facility, or correction program/institution)
- Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau
- Living in housing the local consolidated plan identifies as unstable.

A child or youth who does not quality under any of the seven conditions can qualify under several other federal statutes.

Homeless: An individual or family who lacks a fixed, regular, and adequate nighttime residence with no subsequent residence identified and lacks resources or support networks. Including:

- Having a primary nighttime residence that is not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground
- Living in a shelter designated to provide temporary living arrangements
- Individuals exiting an institution if they were homeless immediately prior to entering the institution or if they became homeless during their stay
- Those who will imminently lose their primary nighttime residence within 30 days of the date of application for assistance

The BHSA definition of homelessness does not include requiring the client meet a low-income threshold, as required under federal law. Unaccompanied youth under 25 years of age, or families with children and youth who do not otherwise qualify as homeless under this definition can qualify under several other federal statutes.

Chronically homeless: A homeless individual with a disability, who lives in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been homeless on any number of occasions for a combined duration of at least 12 months over the last three years. Anyone residing in an institutional care facility who was chronically homeless prior to entry retains that status upon discharge, regardless of length of stay.

Anyone who was chronically homeless, homeless or at risk of homelessness prior to the receipt of Transitional Rent ,or prior to the receipt of housing funded by the Mental Health Services Act, is considered chronically homeless or homeless for BHSA purposes.

Living in encampment: A group of people sleeping outside in the same location over a sustained period with physical structures like tents, personal belongings, and social supports or a sense of community ties.

Recommended ICD-10 Z59-Series Codes for Documenting Homelessness

At-Risk of Homelessness		
Housed but at imminent risk of homelessness, within 30 days. (BHSA defines these individuals as homeless.)	Z59.811	Use when client reports risk of losing housing soon (e.g., eviction notice, lease ending without alternative).
Housed, but was homeless in the past 12 months	Z59.812	Use when client has recent homelessness history and is currently housed.
Housed, but housing situation unstable (details unclear)	Z59.819	Use when housing instability exists, but specifics are unknown.
Homeless		
Homelessness documented, shelter status unknown	Z59.00	Use when homelessness is confirmed but details about sheltered vs. unsheltered are unavailable.
Currently homeless, living in a shelter or transitional housing program	Z59.01	Applies to emergency shelters, transitional housing, or similar programs. Do NOT use for tents or abandoned buildings.
Currently homeless, living outdoors (street, encampment, vehicle, abandoned building)	Z59.02	Use for unsheltered environments, including encampments, cars, or makeshift outdoor structures.