



Drug Medi-Cal Organized Delivery System (DMC-ODS)  
**GRADUATE STUDENT AND TRAINEE INFORMATION SHEET**  
July 2023

San Francisco Behavioral Health Services recognizes the importance of training programs as critical to our workforce development goals as well as the significant contribution of students in our BHS service delivery systems. Our current position is that DMC-ODS providers can recruit graduate students to provide services, under supervision of LPHA, in accordance with [established standards](#). Outstanding questions with the Department of Health Care Services (DHCS) about the implementation of this recent [legislation](#) means these individuals are not yet able to bill for DMC-ODS services. BHS will provide updated information to our CBO partners as soon as it becomes available.

Scope of Practice for Graduate Students:

According to the [DMC-ODS Billing Manual](#), students are defined as individuals who are not registered with the appropriate licensing board. These individuals should use a taxonomy code that is most appropriate based on the student's education, training, and experience.

For the DMC-ODS delivery system, students can currently bill for services if they are an Alcohol or other Drug (AOD) counselor who is 1) either certified or registered by an organization that is recognized by DHCS and accredited with the National Commission for Certifying Agencies (NCCA), and 2) meets all California State education, training, and work experience requirements set forth in the [Counselor Certification Regulations](#). Graduate students can also bill if they qualify as a [Peer Support Specialist](#).

Certified/Registered Drug Counselors and Peer Support Specialists can bill HCPCS codes. Please review the DMC-ODS Provider Crosswalk on the [Provider Billing & Documentation Library](#) or the [DMC-ODS Billing Manual](#) for allowable codes.

What are the Next Steps?

- Ensure all graduate students in DMC- ODS programs are credentialed with the correct taxonomy based on their education and experience. Please update NPPES website and the County Credentialing office with any changes.
- Review and understand the scope of a Graduate Student as currently defined by DHCS.
- Review Agreements and Training Programs with Graduate Schools.

In Summary:

As soon as we receive clarification from DHCS, BHS will notify providers of updated policies and necessary changes.