



Training:
Serving Seniors and Persons with
Disabilities (SPD)

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Revision History

Version	Description of Change	Author	Review Date	Revision Date
1.0	Original/ Initial Version	Brittney Green	01/28/2026	N/A

1. Purpose

This Provider Policy establishes mandatory requirements for contracted mental health and substance use disorder (SUD) providers when serving Seniors and Persons with Disabilities (SPD) enrolled in Holman Group health plans. The policy is designed to ensure compliance with the Knox-Keene Health Care Service Plan Act, DMHC regulations, and applicable federal and state nondiscrimination laws.

Providers are required to apply these standards in all clinical, administrative, and operational interactions with SPD members to ensure equal access, effective communication, and continuity of behavioral health care.

2. Regulatory Authority

This policy is issued pursuant to:

- Knox-Keene Health Care Service Plan Act (Health & Safety Code §1340 et seq.)
- DMHC regulations and All Plan Letters
- Americans with Disabilities Act (ADA)
- Section 504 of the Rehabilitation Act
- California Unruh Civil Rights Act

3. Definitions

Senior: A member aged 65 or older.

Person with a Disability: An individual with a physical, sensory, cognitive, intellectual, developmental, or mental impairment that substantially limits one or more major life activities.

SPD Member: Any Holman Group member meeting one or both definitions above.

Reasonable Accommodation: A modification to policies, practices, procedures, communication methods, or environments that enables equal access to services.

4. Provider Policy Statement

Contracted mental health and SUD providers shall:

- Provide SPD members with nondiscriminatory access to medically necessary behavioral health services.
- Ensure all communications and clinical interactions are accessible and understandable.
- Proactively offer reasonable accommodations when a disability-related need is known or should reasonably be known.
- Comply with all authorization, notice, grievance, and appeal requirements applicable to behavioral health plans.

Failure to comply with this policy may result in corrective action, including remediation, contract action, or reporting to regulatory authorities.

5. When SPD Requirements Must Be Applied

Providers must apply SPD requirements when:

- A member self-identifies as having a disability or special need
- A member requests an accommodation or auxiliary aid
- A disability or functional limitation is documented in clinical records
- Communication, cognitive, sensory, or mobility barriers are observed

SPD protections apply regardless of diagnosis, level of care, or treatment setting.

6. Mental Health and SUD Provider Requirements

6.1 Access to Medically Necessary Care

- Providers shall not deny, delay, or limit mental health or SUD treatment based on a member's disability, age, cognitive status, or functional limitations.
- Clinical decisions must be based solely on medical necessity and covered benefits.
- Providers must assist SPD members in understanding treatment options and participating in care planning.

6.2 Authorization and Utilization Management Support

- Providers must cooperate with Holman Group authorization and UM processes while ensuring accessibility for SPD members.

- When a member's disability affects their ability to participate in standard intake or authorization processes, providers must offer reasonable assistance or alternative communication methods.
- Providers must promptly respond to requests for clinical information and documentation.

6.3 Parity and Nondiscrimination

- SPD members receiving mental health or SUD services shall not be subject to more restrictive clinical, documentation, or administrative requirements than other members.
- Providers must administer care in compliance with state and federal mental health parity laws.

6.4 Continuity of Care

- Providers must take reasonable steps to avoid disruption of treatment for SPD members during transitions such as:
 - Provider termination or transfer
 - Level-of-care changes
 - Authorization or administrative delays
- Providers must coordinate with Holman Group to support continuity of care and safe transitions.

6.5 Communication and Accommodations

Providers must ensure effective communication with SPD members, which may include:

- Use of qualified interpreters (e.g., ASL)
- Allowing service animals
- Providing extended appointment times when clinically appropriate
- Assisting with forms or administrative requirements

Providers may not charge members for accommodations or auxiliary aids.

6.6 Grievances and Appeals

- Providers must inform SPD members of their right to file grievances and appeals.
- Providers must cooperate with Holman Group grievance and appeal investigations.
- Providers must not retaliate against members who file grievances or appeals.

7. Accessibility of Facilities and Programs

Providers must maintain accessible environments, including:

- Accessible entrances, restrooms, parking, and treatment areas
- Policies permitting service animals
- Accessible scheduling and intake practices

Accessibility barriers identified by members, Holman Group, or regulators must be addressed promptly.

8. Training Requirements

Providers must ensure that all staff who interact with Holman Group members:

- Receive initial and annual training on serving SPD members
- Understand disability sensitivity, effective communication, and behavioral health–specific SPD requirements

Training records must be made available to Holman Group upon request.

9. Monitoring and Compliance

Holman Group may monitor provider compliance through:

- Accessibility reviews
- Grievance and appeal trend analysis
- Corrective action plans
- DMHC audit or inquiry responses

Noncompliance may result in remediation, contract action, or regulatory referral.

10. Questions

Questions regarding this policy or SPD requirements should be directed to:

The Holman Group – Compliance Department

Email: ComplianceTeam@holmangroup.com

Approval Authority	Signature	Date
Brittney Green	<i>Brittney Green</i>	01/28/2026