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Threshold Language Assessment Summary Report

Holman Professional Counseling Centers
Assessment Year: 2026
Assessment Period: January 1 – December 31, 2025
Prepared by: Compliance Department
Date Completed: March 2026

1. Purpose

The purpose of this Threshold Language Assessment is to evaluate the linguistic needs of members served by Holman Professional Counseling Centers ("Holman") and to determine whether any non-English languages meet the Department of Managed Health Care (DMHC) Threshold Language requirements pursuant to the Knox-Keene Health Care Service Plan Act and California Code of Regulations §1300.67.04.

This assessment ensures that Holman provides appropriate language assistance services to members with Limited English Proficiency (LEP) and maintains compliance with state regulatory requirements.

2. Methodology

Holman conducted the Threshold Language Assessment using a combined analysis of geographic population data and internal operational indicators to identify languages spoken within the service areas where members reside.

Because Holman does not systematically collect member-reported language preference at enrollment, the assessment relies on geographic population estimates and internal operational data as indicators of potential language needs.

The following methodology was used:

1. **Identify Member Geographic Distribution**	A Geo-Access Report was generated identifying ZIP codes where members reside.
2. **Population Language Analysis**	ZIP Code Tabulation Area (ZCTA) language data was obtained from the U.S. Census Bureau American Community Survey (ACS) 5-Year Estimates.
3. **Language Table Selection**	Census Table C16001 – Language Spoken at Home was used to determine the percentage of individuals speaking languages other than English.
4. **Internal Operational Indicators**	Holman reviewed internal operational data including: • Language interpretation requests • Translation requests • Staff reports of language needs • Intake documentation where language preference is noted • Interpreter service utilization
5. **Threshold Calculation**	Language prevalence was calculated for relevant geographic areas and compared against DMHC threshold language standards.

3. Data Sources

The following data sources were used in the analysis:

Data Source	Description
U.S. Census Bureau – American Community Survey (ACS) 5-Year Estimates	Population language distribution
ACS Table C16001	Language spoken at home by population
ZIP Code Tabulation Area (ZCTA) data	Geographic population estimates
Holman Geo-Access Report	Member distribution by ZIP code
Internal operational data	Interpreter and translation requests

4. Threshold Language Standards

Under DMHC regulations, a language is considered a threshold language when it meets or exceeds the following population thresholds within the plan's service area:

Population Size	Threshold Requirement
3,000 or more LEP individuals	Language is a threshold language
5% of population	Language is a threshold language

5. Findings

Based on analysis of the U.S. Census Bureau American Community Survey (ACS) 5-Year Estimates for the ZIP Code Tabulation Areas (ZCTAs) where Holman members reside, the following estimates represent the percentage of the population speaking languages other than English at home.

Estimated Language Distribution within Member Service Areas

Language Category	Estimated Population Percentage
Spanish Speaking Population	**14.60%**
French Speaking Population	0.05%
German Speaking Population	0.02%
Russian / Polish / Other Slavic Languages	0.39%
Other Indo-European Languages	1.23%
Korean	0.57%
Chinese	1.48%
Vietnamese	0.57%
Tagalog	0.75%
Other Asian / Pacific Languages	0.59%
Arabic	0.37%
Other Unspecified Languages	0.19%

6. Threshold Language Determination

Under California Code of Regulations §1300.67.04, a language is considered a threshold language when it meets or exceeds:

- 3,000 LEP individuals within the plan service area, or
- 5% of the population within the service area.

Based on the language distribution analysis above:

- Spanish represents approximately 14.60% of the population, which exceeds the 5% threshold requirement.
- All other languages identified in the analysis fall below the regulatory threshold level.

Determination

Spanish is confirmed as the Threshold Language for The Holman Group.

No additional languages meet the regulatory threshold requirements based on the population analysis for the current assessment year.

7. Compliance Interpretation

The presence of a 14.60% Spanish-speaking population within the service areas indicates a significant population with potential Limited English Proficiency (LEP). As a result, Spanish language access services must be maintained to ensure meaningful access to services for members.

Holman continues to provide:

- Interpreter services for Spanish-speaking members
- Translation of critical member communications when required

- Language assistance notices informing members of available services
- Access to telephonic interpretation services

These services are provided at no cost to members.

8. Monitoring and Review

Holman's Compliance Department will conduct a Threshold Language Assessment at least every 3 years to ensure ongoing compliance with DMHC regulatory requirements.

The assessment process includes:

- Review of census language data
- Review of member geographic distribution
- Monitoring interpreter service utilization
- Review of translation requests
- Identification of emerging language needs

If additional languages meet threshold standards in future assessments, Holman will update language assistance policies and member communications accordingly.

9. Compliance Statement

Holman Professional Counseling Centers remains committed to ensuring meaningful access to services for individuals with limited English proficiency and maintaining compliance with applicable DMHC and Knox-Keene regulatory requirements related to language assistance and accessibility.

Approval Authority	Approval Date
Compliance	10/31/2026