

## **Exhibit Q-T3A — Primary Follow-Up Clarification Memorandum**

*Re: April 21, 2026 BHSOAC Response to Exhibit Q-T3 — Outstanding Administrative Record, ADA Continuity, Provenance, and Scope Clarifications*

### **Purpose of Submission**

This memorandum is respectfully submitted to preserve administrative-record continuity and to request clarification regarding several discrete procedural, ADA continuity, provenance, and scope questions that remain unresolved following the Commission's April 21, 2026 response to Exhibit Q-T3.

This memorandum is not submitted to seek reconsideration of the Commission's general response, nor to relitigate prior submissions. Rather, it seeks to clarify whether specific procedural anomalies, omissions, continuity concerns, and provenance-related questions raised in Exhibit Q-T3 were:

- addressed,
- partially addressed,
- intentionally excluded, or
- considered outside the Commission's scope.

This clarification is material because the broader BCCP® / B2C3A™ chronology spans:

- November 13, 2019 CPOE / CEOP workforce-equity complaints,
- multiple ADA / IPM proceedings,
- April 10, 2025 public-record entry,
- June-July 2025 BHSOAC and public-health notice, and
- later public institutional convergence around materially related prevention, navigation, and systems-governance themes.

### **I. Administrative Record Preservation**

First, I respectfully request confirmation that:

- Exhibit Q-T3,
- the Commission's April 21, 2026 response, and
- this follow-up memorandum with Appendix A

are each preserved as distinct components of the administrative record.

I also respectfully request written clarification whether the Commission maintains document-specific receipt, routing, timestamp, preservation, categorization, or carry-forward records for Exhibit Q-T3, the April 21, 2026 response, this follow-up memorandum, Appendix A, and the related submissions referenced therein. If such records are maintained, please clarify whether they are publicly accessible, internally maintained, or otherwise identifiable within the Commission's administrative systems, including the specific meeting file, public record location, or CBH website URL, where applicable.

Because Exhibit Q-T3 raised narrower continuity, provenance, and omission questions beyond general process, record integrity is best preserved where each layer of correspondence remains identifiable.

## **II. Omission Chronology and Administrative Deviation Clarification**

Second, while the April 21 response provided useful general information regarding website posting, ADA remediation, and public-comment processing, it did not fully clarify whether the documented omission chronology and prior continuity disruptions raised in Exhibit Q-T3 were specifically reviewed.

Accordingly, I respectfully request clarification whether the Commission specifically reviewed the documented omission chronology reflected in the June 6, 2025 and April 3, 2026 acknowledgments, including whether those events were treated as deviations from standard process or simply as isolated posting delays.

I also respectfully request clarification whether:

- the June 6, 2025 acknowledgment of omitted April and May 2025 submissions,
- the April 3, 2026 acknowledgment that a March 27, 2026 submission had been overlooked or delayed,
- and any related deviations from standard posting, routing, or continuity practices

were specifically evaluated in preparing the April 21 response, or whether that response was limited solely to a general description of standard process.

This distinction is important because a description of ordinary process does not itself clarify whether documented anomalies, omissions, or continuity disruptions were actually examined.

## **III. ADA Title II / Effective Communication Clarification**

Third, Exhibit Q-T3 raised concerns not solely about equal public posting, but about continuity-of-record and effective communication under disability-related conditions, including written-only communication continuity.

The April 21 response indicated that ADA-related submissions receive equivalent care; however, I respectfully request clarification whether the Commission specifically considered:

- ADA Title II effective communication requirements, including 28 C.F.R. § 35.160;
- continuity-of-record where disability accommodations intersect with public submissions; and
- whether any distinction exists between standard public-comment handling and disability-specific continuity safeguards.

This request is narrow and procedural. It does not seek special substantive treatment, but clarification regarding whether continuity-of-record and effective communication were

specifically considered where disability accommodation intersects with public administrative process.

#### **IV. Provenance and Framework-Continuity Clarification**

Fourth, Exhibit Q-T3 raised provenance and continuity questions concerning repeated transmission of externally authored frameworks, including BCCP® / B2C3A™. Because these frameworks were disclosed through ADA / IPM proceedings, public-record entry, and repeated BHSOAC-facing submissions, I respectfully request clarification whether BHSOAC maintains any mechanism — formal or informal — to distinguish ordinary public comment from repeated externally authored framework-continuity submissions.

For administrative clarity, BCCP® / B2C3A™ are referenced here not as ordinary commentary, but as lived-experience-informed, professionally developed public-safety and systems-planning frameworks arising from ADA-period disclosures and grounded in internal and external safety-intelligence, access, and governance concerns.

This is not a request for endorsement, ownership determination, or policy adoption; it is a narrow administrative provenance-and-continuity question.

#### **V. Scope Clarification Regarding Unaddressed Sections**

Fifth, I respectfully request written clarification whether sections or questions within Exhibit Q-T3 that were not substantively addressed in the April 21 response were:

- reviewed but considered outside scope,
- deferred,
- omitted inadvertently, or
- otherwise left unanswered.

This clarification is especially important because the distinction between “not addressed,” “outside scope,” and “not reviewed” materially affects interpretation of the administrative record, including whether narrower continuity, omission, and provenance questions were actually considered.

#### **VI. Leadership-Level Notice and Prior Correspondence Continuity**

Sixth, because prior BHSOAC leadership correspondence in June–July 2025 directly referenced BCCP® / B2C3A™, and because the broader provenance-continuity chronology includes pre-public-record engagement with BHSOAC leadership during active ADA medical leave periods — including April 3 and May 28, 2024 direct communications with Commission leadership; January through April 2025 ADA/IPM and related written disclosures concerning workforce safety, barriers to access, prevention and postvention, and systems-governance issues; and Director-level written notice beginning in 2022 — I respectfully request clarification whether that prior framework-specific notice and continuity history — including the June 20 and July 16,

2025 submissions provided in response to the Commission’s request for specificity — were reviewed or considered in preparing the April 21, 2026 response.

## **VII. Preserved Chronology Significance**

Seventh, I respectfully preserve that the BCCP® / B2C3A™ chronology arose through workforce-equity, prevention, child-safety, family-navigation, and systems-governance concerns before later becoming associated with provenance and framework-continuity issues. This is relevant here only because the increasing public institutional convergence around prevention, navigation, administrative burden, systems complexity, and pipeline-related workforce discussion heightens the importance of accurate chronology, provenance, and administrative continuity. This is also relevant because later contractor-facilitated reform discourse in the IPF process occurred in materially overlapping problem domains, heightening the importance of accurate chronology, provenance, and administrative continuity.

## **VIII. Narrow Clarification Requested**

In summary, I respectfully request clarification regarding:

1. Administrative preservation and identifiable record location of Exhibit Q-T3, the Commission’s April 21, 2026 response, and this follow-up memorandum with Appendix A.
2. Whether the documented omission chronology reflected in the June 6, 2025 and April 3, 2026 acknowledgments was specifically reviewed in preparing the April 21, 2026 response.
3. Whether ADA Title II effective communication and continuity-of-record issues, including 28 C.F.R. § 35.160, were separately considered.
4. Whether any provenance-and-continuity mechanism exists for repeated externally authored framework submissions, including BCCP® / B2C3A™.
5. Whether portions of Exhibit Q-T3 that were not substantively addressed were considered outside scope, deferred, omitted, or otherwise not addressed.
6. Whether prior 2025 BHSOAC framework-specific correspondence informed or was considered in preparing the April 21, 2026 response.

## **Concluding Statement**

I appreciate the Commission’s April 21, 2026 response and recognize the effort to clarify baseline process. This follow-up is submitted because Exhibit Q-T3 raised narrower continuity, provenance, ADA, and omission questions whose procedural significance extends beyond ordinary public-comment mechanics. My intent is administrative clarity, continuity-of-record integrity, and preservation of an accurate chronology regarding BCCP® / B2C3A™ as a systems-level framework whose provenance and continuity were raised through civil-rights, ADA, and public-governance pathways.

This memorandum is submitted consistent with my ADA / §504 written-only communication accommodation and to preserve administrative-record continuity relevant to CRD Case No. 202503-28458711 and HHS OCR Case No. 674306.

Respectfully submitted,

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ADA / §504 Written-Only Communication Accommodation  
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ADA / §504 Notice: This memorandum is submitted pursuant to written-only communication accommodation and for administrative-record continuity purposes.

Rights / Context Notice: BCCP® / B2C3A™ are referenced herein as lived-experience-informed, professionally developed public-safety, prevention, and systems-planning frameworks, including disclosures developed and transmitted during ADA medical leave, for provenance, continuity, and administrative-record clarification purposes only.

Administrative Record Notice: This memorandum is submitted for administrative-record preservation, continuity, and clarification purposes only. It is not submitted to request substantive adjudication beyond the scope stated herein.

## **Appendix A — Supplemental Administrative Record, Chronology, and Evidentiary Context (Exhibit Q-T3A)**

### **Purpose of Appendix**

This Appendix is submitted solely to preserve administrative-record continuity, chronology, provenance, ADA continuity-of-record context, and procedural clarity regarding Exhibit Q-T3, the Commission’s April 21, 2026 response, and related prior submissions. It is not submitted to expand the original request beyond its stated scope, but to preserve context for procedural issues bearing on administrative-record integrity that were omitted, only partially addressed, or left unresolved.

This Appendix is intended to:

- preserve chronology,
- document prior notice,
- identify procedural gaps,
- support ADA continuity-of-record clarification,
- preserve provenance continuity for externally authored frameworks, and
- distinguish between standard public-comment process and documented deviations or unresolved anomalies.

### **I. Core Administrative Context**

On April 6, 2026, complainant submitted Exhibit Q-T3 to the California Behavioral Health Services Oversight and Accountability Commission (BHSOAC) requesting clarification concerning:

- administrative-record annotation,
- continuity-of-record,
- ADA communication continuity,
- provenance,
- framework indexing, and
- related procedural safeguards.

On April 21, 2026, BHSOAC responded with a limited operational-process explanation primarily describing general public-comment handling, ADA remediation, website posting, and State IT processes.

The April 21 response clarified certain baseline procedures, but did not fully address multiple narrower procedural issues raised in Exhibit Q-T3, including:

- omission chronology,
- continuity deviations,
- externally authored framework provenance,
- record-specific annotation limitations,

- Title II effective-communication distinctions, and
- prior leadership-level notice chronology.

## II. Documented Omission / Response Chronology

### A. Prior Notice and Framework-Specific Administrative Record

The broader administrative chronology includes:

- April 10, 2025 — BCCP® / B2C3A™ entered the public behavioral health record.
- June 6, 2025 — Commission staff acknowledged omission-related issues affecting April and May 2025 submissions.
- June 20, 2025 — framework continuity and provenance correspondence was submitted.
- July 16, 2025 — BCCP® was acknowledged in DPH / OVP written communication distributed to county and state governance and oversight recipients.
- July 21, 2025 — BHSOAC Chief Counsel directly referenced BCCP® / B2C3A™ in written correspondence.
- April 3, 2026 — Commission staff acknowledged that a March 27, 2026 submission had been delayed or overlooked.
- April 6, 2026 — Exhibit Q-T3 was submitted for administrative clarification.
- April 21, 2026 — the Commission issued a limited response describing general process.

This chronology is preserved to clarify that framework-specific notice, omission history, and continuity-of-record concerns were not isolated events, but part of a documented sequence preceding and informing Exhibit Q-T3.

### B. Administrative Gap

Because the April 21 response primarily described generalized process, clarification remains necessary as to whether:

- prior framework-specific submissions were separately identified, indexed, or otherwise distinguishable within the administrative record;
- the documented omission chronology reflected in the June 6, 2025 and April 3, 2026 acknowledgments was specifically reviewed;
- provenance continuity was administratively considered; and
- prior documented disruptions, omissions, or delays affected continuity-of-record handling for later related submissions.

This distinction matters because a generalized description of standard process does not itself clarify whether known deviations from that process were examined, documented, or integrated into the Commission's response.

## III. ADA Continuity-of-Record Clarification

Exhibit Q-T3 specifically raised continuity concerns not limited to ordinary public comment, but to:

- ADA-submitted materials,
- written-only communication needs,
- continuity across disruptions, and
- effective communication under disability-related conditions.

Although BHSOAC stated that ADA submissions receive “the same level of care,” this Appendix preserves the distinction that such treatment does not itself establish whether disability-specific continuity safeguards, record alignment, or effective-communication obligations were separately considered where continuity disruptions, omissions, or procedural ambiguity were documented.

Accordingly, this Appendix preserves the distinction between:

- ordinary public posting; and
- ADA continuity-of-record adequacy.

#### **IV. Provenance and Framework Continuity**

This Appendix further preserves that BCCP® / B2C3A™ were not submitted merely as ordinary commentary, but as externally authored public-health, prevention, postvention, systems-governance, and family-navigation frameworks repeatedly transmitted across:

- County channels,
- Commission channels,
- ADA / IPM disclosure pathways,
- DPH / OVP and related public-health pathways,
- UCLA and related academic / public-health pathways,
- Senate and legislative pathways,
- DHCS-related channels,
- CRD-related submissions,
- national professional ethics and governance channels, including psychology, psychiatry, social work, counseling, and public-health review pathways, and
- other oversight pathways.

For administrative clarity, this Appendix also preserves that BCCP® / B2C3A™ were submitted not merely as commentary, but as lived-experience-informed, professionally developed public-safety, prevention, postvention, and systems-planning frameworks whose handling may not be fully captured by ordinary public-comment processes alone.

The procedural question preserved here is narrow: whether any mechanism exists to preserve provenance continuity where an externally authored framework is repeatedly submitted, referenced, and materially relevant to ongoing policy discourse, beyond chronological posting alone.

Stated differently, the issue is not whether the Commission was required to endorse, adopt, or adjudicate the framework, but whether repeated framework-specific submissions were received, preserved, and capable of being interpreted as part of a continuous provenance record rather than as isolated instances of ordinary public comment.

This is not a request for endorsement, adjudication, or intellectual-property determination. It is an administrative continuity question.

Relatedly, the transdisciplinary ethics relevance of BCCP® / B2C3A™ was reflected in external professional-governance routing during 2025–2026, including receipt and internal routing confirmations from psychology, psychiatry, social work, and public-health ethics channels. This is preserved here not as proof of substantive endorsement, but as additional context showing that the frameworks were repeatedly treated as governance-, ethics-, and systems-relevant submissions rather than as isolated commentary. Additional cross-disciplinary routing and provenance context is preserved separately in **Exhibit W-1**.

## **V. Provenance Chronology and Prior Institutional Notice**

For administrative-record continuity, this Appendix preserves that BCCP® / B2C3A™ provenance and framework identity were presented to relevant public entities through multiple channels before later Commission-related prevention, partnership, contracting, or implementation activity.

Relevant chronology includes:

- Pre-July 2024 engagement with BHSOAC leadership concerning postvention, systemic equity, and oversight continuity, including April 3 and May 28, 2024 communications with Commission leadership.
- January 20–21, 2025 formal non-authorization and attribution notices transmitted through SEIU and stated during the ADA-protected Interactive Process Meeting, reflecting pre-public-record notice of framework identity and authorship.
- January 21, 2025 ADA Interactive Process Meeting disclosures involving system-level access, workforce, and public-safety concerns later reflected in or formalized through BCCP® / B2C3A™.
- March 28, 2025 written assertion of framework relevance to CARE Court equity and process-improvement concerns transmitted to Director Wong before first public-record entry.
- April 2–7, 2025 written correspondence and public comment identifying attribution, family-navigation, CARE Court, and care-to-custody concerns in the days immediately preceding the April 10, 2025 public-record entry.
- April 10, 2025 public-record entry of BCCP® / B2C3A™ through Los Angeles County Behavioral Health Commission proceedings.
- April 24, 2025 framework submission to BHSOAC.
- June and July 2025 written correspondence in which BHSOAC Chief Counsel referenced complainant’s asserted authorship and provenance concerns regarding BCCP® / B2C3A™; Chief Counsel Gallardo also expressly acknowledged BCCP® as proprietary.

- July 16, 2025 — Los Angeles County Department of Public Health, Office of Violence Prevention correspondence distributed to county and state-level governance and oversight recipients, including MHSOAC, expressly referencing the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP®) / B2C3A™ and complainant’s leadership in systems reform.
- March 27 and April 3, 2026 Commission staff correspondence addressing receipt, retention, posting, and omission-related issues concerning submitted materials.

Relatedly, BHSOAC Chief Counsel’s June 19, 2025 correspondence requested specific examples, documents, passages, and supporting documentation concerning alleged framework use, with a 30-day response period. Complainant responded within that period, including June 20 and July 16, 2025 submissions directed to framework continuity, provenance, and implementation integrity; however, Chief Counsel’s July 21, 2025 final response stated that no sufficiently detailed evidence had been received. This sequence is preserved here not to relitigate the underlying attribution dispute, but to clarify a procedural continuity question as to how submitted evidence, supporting documentation, and related correspondence were received, reviewed, characterized, and retained within the administrative record.

Relevant pre-public-record chronology also includes Director-level written ADA/IPM notice beginning in 2022, including SEIU escalation correspondence to Director Wong regarding accommodation delays, displacement-related concerns, and related ADA / FEHA process issues.

Relevant 2022 chronology also includes former DMH Director Dr. Jonathan Sherin’s April 19, 2022 resignation statement — issued the same day as complainant’s first ADA / IPM proceeding — stating:

*“I know firsthand that it isn’t easy to work within a system that is often focused more on taking care of various bureaucratic processes than on the communities we are here to serve.” — Dr. Jonathan Sherin, DMH Director, April 19, 2022*

This is preserved here not as a merits argument, but as contemporaneous context reinforcing that bureaucracy-versus-community tensions predated later framework-related submissions and remained materially relevant to subsequent prevention, access, and governance concerns.

Chair Alvarez’s May 22, 2025 remarks publicly articulated navigation, crisis-access, and systems-burden concerns as recurring governance issues:

*“Frankly, we’re not even going to be able to do that on our own. So, I’m holding this like what are we contributing to? ... Something that comes up time and time again is like navigation. What happens when my child has a crisis and do I know how to get the services ... navigating these behemoth of systems is a challenge.” — Chair Mayra Alvarez, May 22, 2025*

That navigation concern was then immediately reframed in access-and-equity terms during the contractor-facilitated IPF discussion:

*“Is there a single door or are there 20 doors that you have to go through? ... someone can have a paved path to that door and someone has to go climbing mountains to get to that door.”* — Marco Mijic, Sellers Dorsey facilitator for the May 22, 2025 IPF discussion, introduced by BHSOAC Chair Alvarez

Those remarks occurred after prior consultation, written submissions, and public-record entry raising materially similar navigation, access, and systems-burden concerns. Whether or not this is treated as direct adoption, the chronology presents a provenance, notice, and administrative-continuity question as to how earlier lived-experience-informed, professionally developed framework submissions were handled, preserved, and reflected in later Commission discussion.

Any assertion that later workforce, safety, access, prevention/postvention, or equity-related reforms arose without relevant awareness or knowledge would be difficult to reconcile with the documented chronology of prior consultation, ADA / IPM-related disclosures, public-record submissions, legal-entity provider concerns, and later Commission discussion of materially similar problem domains. This chronology is preserved here not to request substantive adjudication, but to clarify the importance of provenance continuity, administrative-record integrity, and accurate treatment of prior notice. These circumstances are included to clarify that framework identity, authorship assertion, provenance concerns, and continuity-of-submission issues were clearly presented to relevant public entities and remained sufficiently specific to warrant accurate preservation and interpretation within the administrative record.

The May 22, 2025 record also preserves a governance and public-funds question regarding how a private contractor-facilitated role was introduced into the IPF process, including whether that engagement was publicly voted on, otherwise approved through an identified contracting pathway, and how it was expected to strengthen oversight, accountability, and timely care after more than twenty years of MHSA experience.

Relatedly, the May 22, 2025 record also preserves a chronology, governance, and oversight question regarding contractor-facilitated materials presented in the IPF process. Without asserting misconduct or adjudicating adoption, the timing is relevant because post-April 2025 contractor-supported language concerning structural reform, lived experience, cultural relevance, trauma-responsive transformation, implementation fidelity, and cross-sector systems change appears in the same period after BCCP® / B2C3A™ entered the county and state public record. This raises a narrow administrative question as to whether BHSOAC maintained any oversight, integrity, or fidelity safeguards where contractor-supported work drew upon problem domains previously introduced through lived-experience-informed, ADA-period, or CARE Court-related public submissions. A comparative chronology of public-facing contractor language, including Internet Archive / Wayback-derived public web captures, is preserved separately and may be made available upon written request for record-clarification purposes.

## **VI. Procedural Redirection Context**

Across multiple institutional settings, complainant has documented recurring patterns in which clinical ethics, suicide prevention and postvention, public-safety concerns, workforce-equity issues, and governance-related framework concerns were redirected into alternate procedural

channels rather than preserved in a continuous, clearly attributable, and administratively coherent record.

This Appendix does not ask BHSOAC to adjudicate the conduct of unrelated entities. Rather, it preserves that Exhibit Q-T3 sought clarification in part because continuity-of-record integrity is especially important where repeated procedural redirection may affect the preservation, visibility, attribution, or later interpretation of earlier submissions, warnings, and framework-related disclosures across systems.

## **VII. Scope Clarification Preservation**

The April 21 response appears to have substantively addressed general Sections A–D process questions, but did not fully clarify whether:

- all sections were considered,
- some sections were treated as outside scope,
- provenance-specific concerns were narrowed to generalized process, or
- omission chronology was separately reviewed.

This Appendix therefore preserves the procedural significance of any distinction between sections or questions that were:

- answered,
- partially answered,
- left unaddressed, or
- intentionally excluded from the Commission’s response.

## **VIII. Public Record, ADA, and Related Procedural Relevance**

The preserved chronology may also bear on:

- CRD administrative completeness,
- HHS OCR effective-communication and disability-access review,
- DHCS / public-funds or fraud-review continuity,
- ADA / IPM continuity,
- CARE Court communication continuity,
- public-record integrity, and
- related oversight or professional-review proceedings, including Board of Psychology matters where professional participation, standing, or record completeness may be implicated.

This Appendix does not request substantive adjudication of those matters by BHSOAC. It preserves continuity only to the extent that BHSOAC administrative-record structure, posting practices, and continuity-of-record handling may intersect with those broader procedural systems. This is especially relevant where employee, ADA, and IPM records may otherwise remain chronologically incomplete unless parallel BHSOAC-facing submissions, public

comments, and related record-integrity documentation are accurately preserved and reflected. This is also relevant where timely and responsive action on safety-intelligence, public-safety planning frameworks such as BCCP® / B2C3A™, access barriers, and continuity-of-record may bear on the efficient use of public funds — particularly in light of the 2024 child-fatality and workforce-safety context, and the continued public discussion of reform more than twenty years into MHSa implementation.

This is also relevant for contextualizing later philanthropy- and partnership-based reform activity. That includes public discussion of cross-sector collaboration, workforce pipeline development, and externally supported systems change involving entities such as UCLA, Ballmer-linked philanthropy, and LACDMH. In that context, accurate chronology, prior notice, and continuity-of-record may bear on how public problems, lived-experience-informed frameworks, ADA / IPM proceedings, and public funds are translated into institutional action.

## **IX. Requested Administrative Understanding**

This Appendix preserves the understanding that:

- public posting may preserve the existence of a submission; but
- public posting alone does not necessarily resolve continuity, provenance, annotation limits, omission correction, or disability-aligned communication continuity, each of which may require narrower administrative clarification.

## **X. Concluding Administrative Record Statement**

This Appendix is submitted solely to preserve chronology, procedural continuity, and evidentiary context concerning:

- Exhibit Q-T3,
- BHSOAC's April 21, 2026 response,
- prior BCCP® / B2C3A™ submissions,
- ADA continuity-of-record concerns, and
- provenance continuity.

It is intended as supplemental administrative context only and should not be construed as a request to alter prior public comments, expand confidential review, or seek substantive adjudication beyond the Commission's jurisdiction. This Appendix is submitted in support of the narrower procedural clarifications requested in Exhibit Q-T3A.

Respectfully submitted,

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 Licensed Clinical Psychologist  
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 ADA / §504 Written-Only Communication Accommodation

May 2026

Appendix A to Exhibit Q-T3A — Provenance / Administrative Record Appendix

Administrative Record / Rights Notice: This Appendix is submitted solely to preserve chronology, provenance continuity, and administrative-record context. BCCP® / B2C3A™ are referenced herein for provenance, continuity, and administrative-record clarification purposes only.