

Public comment from E. Mohammad

From: Tamim Mohammad <tamimmohammad@gmail.com>

Sent: Monday, May 25, 2026 1:30 PM

To: Amy Vang <amy.vang@bhsoac.ca.gov>; Sandra Gallardo <Sandra.Gallardo@bhsoac.ca.gov>

Cc: Brenda Grealish <brenda.grealish@bhsoac.ca.gov>; BHSOAC <bhsoac@bhsoac.ca.gov>; Procurements <procurements@bhsoac.ca.gov>; BHSOAC Public Comment <publiccomment@bhsoac.ca.gov>; Amariani Martinez <amariani.martinez@bhsoac.ca.gov>; Danielle Fischer <danielle.fischer@bhsoac.ca.gov>; Ruvalcaba, Lorena@calcivilrights <lorena.ruvalcaba@calcivilrights.ca.gov>

Subject: Record-Continuity Clarification — May 6 and May 18, 2026 Public Comment Postings Re: Follow-Up: Confirmation of Receipt Requested — PRA 2026-09 / Exhibit Q-T6 Submission Re: PRA 2026-09 — Clarification and Record Preservation re IPF Development, Search...

Dear Ms. Vang, Ms. Gallardo, and Commission Staff,

I am writing with a narrow record-continuity clarification regarding the Commission's posted public-comment materials for May 6 and May 18, 2026.

I reviewed the public-comment link identified as "View public comment received May 18, 2026." The posted PDF appears to include Exhibit Q-T6 and related exhibit materials, but it does not appear to include the May 18, 2026 cover correspondence that transmitted and contextualized Exhibits Q-T6, Q-T6A, and Q-T6B.

I also reviewed the May 6, 2026 public-comment posting and observed a similar issue: the posted material appears to include the attached exhibit materials, but not the cover correspondence that explained the purpose, procedural context, and record-continuity significance of the submission.

I respectfully request clarification whether the May 6 and May 18 cover correspondence have been preserved as part of the corresponding public-comment records, PRA 2026-09 record, and May 28, 2026 meeting-related administrative record. If omission of the cover correspondence from the posted public-comment PDFs was inadvertent, I respectfully request that the posted public-comment records be supplemented to include the cover correspondence or otherwise reflect that the cover correspondence was received, preserved, and associated with the attached exhibits.

This request is limited to record continuity, posting accuracy, and administrative-record integrity. The May 18 cover correspondence is material because it identified the purpose

of the submission, requested prioritization of the cover correspondence and Exhibit Q-T6, clarified the distinction between a procedural “no responsive records” search position and any broader implication regarding institutional awareness, and requested confirmation that the materials were being processed through standard public-comment and administrative-record channels.

The May 18 cover correspondence specifically stated:

“Given the length of the attached materials, I respectfully request that the Commission prioritize review of this cover correspondence and Exhibit Q-T6 — particularly the thirteen clarification questions in Section VI.”

That language is material because the posted PDF includes the exhibit materials but appears to omit the very cover correspondence that identified how the Commission should prioritize, understand, and administratively process the submission.

This context is also material because the omitted cover correspondence connected the exhibits to the Commission’s own public-record commitments:

April 24, 2025 — Dr. Esroruleh T. Mohammad, Ph.D., public comment introducing BCCP® / B2C3A™ into the state Commission record:

“The BureauCare-to-Custody-Cemetery Pipeline is a prevention framework — diagnostic in its clarity and prescriptive in its solutions.”

April 24, 2025 — Commissioner Will Lightbourne, BHSOAC:

“The summaries done in this document don’t do justice at all to what people had sent in,” and staff would work to present substance that “does justice to the organizations that took the time to send their ideas in.”

May 22, 2025 — Chair Mayra Alvarez, BHSOAC:

“Something that comes up time and time again is 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.”

These public-record statements make accurate posting, preservation, and contextual review of BureauCare-to-Custody-Cemetery Pipeline® (BCCP®) / B2C3A™ cover correspondence material to Commission transparency, public-comment integrity, and implementation fidelity.

This issue is also material in light of the Commission’s prior omission history. In June 2025, Commission staff acknowledged and apologized for the omission of prior BCCP® / B2C3A™ public-comment submissions from meeting materials, while other public-comment materials, including materials from CPEHN, were included in the official

meeting record. The recurrence of cover-correspondence omission in May 2026 raises a renewed concern regarding differential handling, completeness of Commission review, and the ability of Commissioners and the public to understand the procedural significance of submitted materials.

The concern is not merely formatting. Where BCCP® / B2C3A™ materials concern public-safety analysis, access barriers, prevention, postvention, administrative burden, family navigation, implementation fidelity, and IPF search-scope issues, omission of the cover correspondence can materially alter the public record by separating exhibits from the stated purpose, procedural request, and civil-rights/ADA record-continuity context in which they were submitted.

This clarification is time-sensitive because the May 28 agenda materials include the Executive Director's Update addressing IPF, Commission 2.0, operational excellence, stakeholder engagement, public trust, Commission infrastructure, grant/contract strengthening, and community participation. Accurate posting and preservation of cover correspondence is therefore material to administrative-record continuity, public-comment integrity, and transparent Commission review.

This concern is further heightened because the Executive Director's materials identify active Commission infrastructure, staffing, grant/contract, research/evaluation/program, public-engagement, and IPF implementation issues during the same period. The Commission itself has publicly recognized the importance of institutional memory and prior committee knowledge. At the April 24, 2025 BHSOAC session, Commissioner Chambers asked:

“Do we have anybody that has any knowledge... like, wins, like, from these committees... and the work that they did for the 14 plus years.”

Where public comments concern BCCP® / B2C3A™ provenance, IPF search scope, implementation fidelity, public-safety analysis, and ADA/IPM record continuity, omission of the transmitting cover correspondence may prevent Commissioners, staff, and the public from understanding the relevance of the submission to the very operational, trust, engagement, research/evaluation, institutional-memory, and innovation issues before the Commission.

Because the May 6 and May 18 submissions concern IPF search scope, public-comment handling, administrative-record integrity, stakeholder trust, and implementation-fidelity issues that overlap with the Executive Director's Update, I respectfully request clarification regarding whether and how those submissions are being associated with the May 28 meeting materials. This includes any conflict-screening considerations related to IPF development, contractor involvement,

Commissioner roles, County leadership roles, or prior Chair-level consultation history already identified in the May 18 submission.

Please confirm in writing:

- Whether the May 6 and May 18 cover correspondence were preserved with the corresponding public-comment and administrative records;
- Whether the posted public-comment PDFs will be supplemented or annotated to reflect the cover correspondence;
- Whether the cover correspondence and exhibits are being associated with the May 28, 2026 meeting-related administrative record;
- Whether any Commission policy explains why attachments are posted without the transmitting cover correspondence when the cover correspondence provides the procedural context for the submission;
- Whether the Commission's current posting approach reflects a change from prior practice, including prior instances in which cover emails, transmitting correspondence, or email threads were posted with public-comment materials;
- Whether any legal, administrative, accessibility, privacy, PRA, conflict-screening, or civil-rights-related reason explains why the May 6 and May 18 cover correspondence were not included in the posted public-comment PDFs;
- Whether the May 6 and May 18 cover correspondence and exhibit materials were reviewed for inclusion in the May 28, 2026 meeting materials or linked materials;
- If they were not included in, linked to, or associated with the Executive Director's Update or May 28 meeting materials, what administrative, procedural, legal, accessibility, or agenda-management basis explains that decision.

Please provide all responses in writing to this email address only, consistent with my ADA / Section 504 written-only communication accommodation.

Respectfully,

Dr. Esroruleh T. Mohammad, Ph.D.

Licensed Clinical Psychologist

Author, BureauCare-to-Custody-Cemetery Pipeline® / BCCP® and B2C3A™ Pipeline Prevention Model

Systems Equity & Family Advocate | CARE Court Petitioner (2024–2025)

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ADA / Section 504 Written-Only Communication Accommodation

CRD Case No. 202503-28458711
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