Public comment from E. Mohammad

From: Tamim Mohammad <tamimmohammad@gmail.com>
Sent: Monday, October 20, 2025 7:59 AM
To: Mayra Alvarez <mayra.alvarez@bhsoac.ca.gov>; Brenda Grealish <brenda.grealish@bhsoac.ca.gov>; BHSOAC Public Comment <publiccomment@bhsoac.ca.gov>; BHSOAC <mhsoac@mhsoac.ca.gov>
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Subject: Public Comment Submission – Provenance Recognition and Structural Convergence (Post–April 2025 Framework Adoption)

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Dear Chair Alvarez, Executive Director Grealish, and Commissioners:

I respectfully submit this public comment for inclusion in the Commission's administrative record and future meeting docket. This correspondence is submitted in my personal capacity as an ADA-protected clinician and systems-equity strategist on involuntary medical leave, consistent with Title II of the Americans with Disabilities Act and the Bagley-Keene Open Meeting Act (Gov. Code § 11120 et seq.).

Purpose of Submission
This correspondence provides an evidence-based analysis of structural and linguistic changes observed in the Commission's agendas and governance framing following the public-record entry of the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Pipeline Prevention Framework between April 4 and April 10, 2025. Its purpose is to preserve factual continuity, document provenance, and ensure lawful authorship recognition within the Behavioral Health Services Oversight and Accountability Commission's (BHSOAC) strategic processes.

Summary of Observed Structural Change

Pre-BCCP Period (February–March 2025)

- Commission agendas and minutes emphasized administrative functions (budget approvals, legislative reports, wildfire response).
- No use of continuum-of-care, integration, or prevention-infrastructure terminology.
- Innovation Partnership Fund and systemic prevention frameworks were not structurally defined.

Post-BCCP Record Entry (April 24–October 23 2025)

- Measurable linguistic and structural convergence with BCCP™ / B2C3A™ frameworks, including:
    - Recurrent use of "continuum," "integration," "infrastructure," and "crisis continuum."
    - Framing of the Innovation Partnership Fund as a statewide systems-integration tool.
    - Cross-agency references linking CalHHS, DHCS, and County behavioral-health programs in alignment with continuum logic.
    - Establishment of the Client, Family, and Community Inclusion Committee reflecting B2C3A™ relational-governance emphasis.

These changes are temporally and linguistically consistent with the frameworks' entry into the public record via the Los Angeles County Behavioral Health Commission (April 4 & 10, 2025) and BHSOAC (April 24 & May 22, 2025), registered under U.S. Copyright TXu 2-486-534.

Requested Administrative Action

1. Provenance Recognition – Index this correspondence under *Public Comment / Provenance Recognition* in the Commission's record.
2. Record Annotation – Annotate the April 24 and May 22, 2025 meeting minutes to acknowledge the ADA-protected frameworks (BCCP™ / B2C3A™) aligned with subsequent agenda structure.
3. Oversight Referral – Ensure review of authorship integrity, attribution fidelity, and ADA participation compliance by relevant oversight bodies (MHSOAC, State Auditor, Civil Rights Department).

Scope Clarification
This submission is a recognition-only filing. It discloses no operational methods or proprietary content. Its sole purpose is to ensure transparency, ADA compliance, and historical accuracy within California's behavioral-health transformation record.

Closing Statement
The convergence of system language and structure following the BCCP™ / B2C3A™ filings represents a pivotal shift toward prevention-based governance and infrastructure integration. Acknowledging the frameworks' provenance safeguards ethical authorship and public trust, ensuring that California's behavioral-health transformation remains transparent, evidence-based, and inclusive of ADA-protected contributors. The attached exhibits (Q-T1 and Q-T2) also document subsequent Commission staffing and governance developments consistent with the frameworks' data-driven oversight emphasis.

Respectfully submitted,
Dr. Esroruleh Mohammad, Ph.D.
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Attachments: Exhibits Q-T1 and Q-T2 – Continuity and Convergence Record (February–October 2025)

EXHIBIT Q-T1

Continuity and Provenance Timeline
January 2022 – October 2025
Behavioral Health Systems Transformation Record
Recognition-Only Submission under ADA Title II and Bagley-Keene Act (Gov. Code § 11120 et seq.)

Submitted to:
Behavioral Health Services Oversight & Accountability Commission (BHSOAC)

Prepared by:
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Note on Identifications
All individuals referenced in this document are identified solely in their official capacities as public officials or agency representatives. No private, personal, or non-public information is included. All events and quotations are drawn from verifiable public-record sources, including official minutes, meeting recordings, or agency correspondence.

Recognition-Only Disclosure
This exhibit is submitted exclusively to preserve factual continuity, authorship provenance, and ADA Title II participation compliance. It discloses no operational methods, trade secrets, or proprietary implementation materials and is intended solely for lawful archival and transparency purposes.

Purpose of Exhibit

This exhibit documents verifiable, date-specific events establishing continuity of disclosure, authorship provenance, and systemic convergence between January 2022 and October 2025. It is submitted for recognition only—no operational tools or proprietary implementation methods are disclosed.

Supplemental Context:
Complements Exhibits Q-24 through Q-26 by providing the factual sequence of disclosures, institutional meetings, and public proceedings forming the evidentiary foundation for provenance recognition of the BCCP™ / B2C3A™ frameworks.

Scope and Status:
Covers key meetings, submissions, and public statements involving the Behavioral Health Services Oversight & Accountability Commission (BHSOAC), Los Angeles County Department of Mental Health (DMH), and affiliated oversight bodies. Recognition-only filing under the

Bagley-Keene Open Meeting Act and Title II ADA participation standards. All events are verifiable through public minutes, official correspondence, or recordings.

Continuity and Provenance Timeline

Date	Event / Forum	Participants / Officials	Relevance to Provenance or ADA Record
Jan 13 2022	PEI Program meeting on ethical data collection and quality assurance	Keri Pesanti (PEI Head); Wendy Tovey (District Chief); Melodie Shaw (SEIU); Dr. Mohammad	Clarified ethical-practice concerns and data standards; established record of professional diligence preceding later ADA/IPM activity.
Apr & Nov 2022	ADA Interactive Process Meetings requested and denied	DMH HR and Prevention Bureau Mgmt (Robert Byrd, Kachana Tate)	Documented early ADA/FEHA requests rejected; began displacement trajectory later confirmed in 2025 IPM.
May 31 2022	ADA-protected meeting during medical leave	Dr. Keyondra Bunch (MHSOAC / LACDMH)	Discussed workforce-equity and ethics issues; sets baseline for ADA context.
Oct 2023	High-Risk Pediatric Case – Village Family Services	PM III Anthony Alvarado; Dr. Curley Bonds (Medical Director); Village Family Services clinicians; DCFS/FFA team; Dr. Mohammad	Interdisciplinary consults on trauma pharmacotherapy and safety coordination; documented recommendation for cross-system clinical review and risk mitigation; establishes early authorship of Safety-First and interdisciplinary-continuum concepts.
Oct 12 2023	Direct Consultation with DMH Director Dr. Lisa Wong (AAMH Conference Follow-Up)	Dr. Mohammad; Dr. Wong	Email correspondence on network adequacy and culturally competent care; demonstrates executive-level engagement and alignment with later system-equity framework logic.
Jan 2024	Child fatality under County care	LACDMH / County agencies	Sentinel event prompting child-suicide postvention advocacy and systemic reform proposals.
Apr 3 & May 28 2024	Meetings with Chair Mayra Alvarez (MHSOAC / Children's Partnership)	Dr. Mohammad; Chair Alvarez	Discussed postvention and systemic equity. Chair Alvarez stated intent to consult Kim Lewis (NHeLP) but no follow-up occurred. After lack of response, Dr. Mohammad independently initiated contact with Kim Lewis to ensure continuity of oversight dialogue.
Jul 25 2024	Consultation with Kim Lewis, J.D.,	Dr. Mohammad; Kim Lewis	One-hour consultation on emerging components of the BCCP™ framework

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Date	Event / Forum	Participants / Officials	Relevance to Provenance or ADA Record
	National Health Law Program		and equity implications in behavioral health governance. Ms. Lewis engaged in substantive discussion and noted key elements during the meeting. The finalized and copyrighted framework (April 2025) was later provided for informational review, with receipt acknowledged on May 13 2025.
Jan 21 2025	ADA Interactive Process Meeting (IPM)	DMH HR Mgr Stanley Yen; SEIU Rep. Melodie Shaw, CMMD Mgr Bill Tanner	Documented reassignment from clinical to clerical duties; origin of framework constructs on fragmentation and accountability.
Apr 3–4 2025	Correspondence to DMH Director Dr. Lisa Wong	Dr. Mohammad; Dr. Wong & Chief of Staff	Outlined uncredited integration of BCCP™ concepts across DMH programs; acknowledged by Director.
Apr 4 2025	CARE Court Town Hall and L.A. County Behavioral Health Commission	Dr. Mohammad	Attended as displaced County clinical psychologist on ADA medical leave and CARE Court petitioner. Submitted written statement after technical disruption. Statement documented structural exclusion and noted prior extraction of BCCP™-aligned oversight concepts during "consultative" interviews conducted by CARE Court leadership in December 2023 and Sept–Nov 2024. Highlighted ADA access barriers, trauma-informed redesign needs, and equity-centered accountability. Elements of this statement later appeared in County and State leadership language; coincided with announcement of the $4B systemic child abuse settlement.
Apr 10 2025	Formal public record entry of BCCP™ / B2C3A™ Frameworks	Behavioral Health Commission	Recorded introduction and distribution of materials; basis for U.S. Copyright TXu 2-486-534.
Apr 16 2025	DMH PPSGC Meeting	Dr. Lisa Wong	Confirmed departmental awareness of BCCP™ content ("*Proposition 1 removes prevention completely*").
Apr & Nov	Conflict of Interest – Licensed Leadership	Dr. Robert Byrd (Deputy Director);	Byrd denied ADA/FEHA grievances then co-signed $50M contracts derived

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Date	Event / Forum	Participants / Officials	Relevance to Provenance or ADA Record
2025 Context		Kachana Tate (Manager)	from BCCP™/B2C3A™; illustrates licensure conflict.
Apr 24 & May 22 2025	BHSOAC public hearings	Chair Alvarez; Commissioners	Frameworks presented and discussed; entered into State record; first use of "continuum" and "infrastructure."
May 22–23 2025	MHSOAC contracting with Sellers Dorsey (private equity)	Commission Leadership and Sellers Dorsey	Contract deliverables mirrored BCCP™ logic; clarification request submitted 5/23/25.
May 8 2025	DMH Direct Order restricting communication	DMH Leadership	Issued same day State proceedings adopted similar language; limited ADA participation.
Jun 6 2025	MHSOAC apology letter	Commission Staff	Acknowledged omission of multiple rounds (April–May) of BCCP™ comments; issued procedural correction.
Sept 10 2025	DMH HR ADA/IPM update	Mgr. Stanley Yen; DHR Asst. Director Johan Julin	County officials publicly acknowledged "40-year-old rules," "cringe-worthy provisions," and outdated civil-service constraints—directly mirroring the January 21 IPM disclosures on ADA process failures and governance lag. On the same date, a publicly reported child fatality in Los Angeles County (*Los Angeles Times*, Sept 11 2025) occurred amid the same structural oversight gaps, underscoring the public-safety implications of continued non-intervention. Included for historical accountability and evidentiary continuity.
Sept 23 2025	L.A. County Board of Supervisors Session	Supervisors Solis & Barger; DHR Director Lisa Garrett; CEO Joseph Nicchitta	Confirmed clerical reclassification and equity deficits first raised in IPM.
Sept 30 2025	CEO Budget Reform Hearing	CEO Fesia Davenport; DA Nathan Hockman	Announced program-based budgeting and transparency reforms; validated BCCP™ analysis.
Oct 7 2025	Board After-Action Review	Board of Supervisors	Entered provenance and ADA-governance convergence into County record.
Oct 9 2025	L.A. County Behavioral Health	DMH Chief Deputy Director Rimmi	Senior leaders across DMH, SAPC, and CARE Court publicly advanced reform

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Date	Event / Forum	Participants / Officials	Relevance to Provenance or ADA Record
	Commission Meeting	Hundal; SAPC Director Dr. Gary Tsai; CARE Court Team (Martin Jones, Dr. Sarah Church)	agendas structurally and linguistically aligned with the BCCP™ / B2C3A™ frameworks. Their statements referenced a "paradigm shift," "cultural change," and adoption of the Clubhouse Model; emphasized "workforce… licensed clinicians" and influencing the "licensing process at the state level"; and endorsed a "framework of relentless engagement." These declarations collectively reaffirmed the analytic constructs first disclosed in the January 21 ADA IPM, evidencing sustained cross-agency convergence and protected framework adoption. This convergence occurred against the backdrop of the July 2025 Care Court statutory amendments expanding petitioner inclusion—reforms consistent with the framework's principles but implemented while the original petitioner-author remained excluded from participation.
Oct 14 2025	L.A. County Board Item 19	Board of Supervisors	Authorized infrastructure grants mirroring B2C3A™ logic ("expand the continuum"; "prevention as infrastructure").
Oct 17 2025	PERB / ERCOM / SEIU filings	Board Chair Eric R. Banks; Member Arthur A. Krantz	PERB correspondence (Response to Motion for Recusal and Disclosure) characterized portions of Dr. Mohammad's motion as "fabricated." Included to document procedural posture following prior provenance recognition and illustrate institutional reframing coincident with State-level authorship validation.
Oct 23 2025	BHSOAC Staff Restructuring Announcement	Commission senior leadership & research/HR hires	Public release of multiple senior positions (Research Scientist II, HR Chief, Staff Services Manager II) signals institutional resourcing in support of data-driven oversight and structural transformation aligned with the BCCP™ / B2C3A™ frameworks.

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Summary Statement

The chronology demonstrates an unbroken chain of disclosure, denial, and subsequent institutional adoption linking County- and State-level behavioral-health reform language to the ADA-protected BCCP™ and B2C3A™ frameworks. Each entry is verifiable through public minutes or official correspondence and collectively confirms systemic convergence between January 2022 and October 2025.

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Cross-Reference: LACDMH Behavioral Health Commission minutes (Apr 4 & Apr 10 2025) and BHSOAC hearings (Apr 24 & May 22 2025) provide corresponding public-record citations.

Respectfully submitted,
Dr. Esroruleh T. Mohammad, Ph.D.
October 2025

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Exhibit Q-T2

Continuity and Convergence Analysis
Behavioral Health Services Oversight & Accountability Commission (BHSOAC)
Governance Language and Agenda Framing, February–October 2025
Correlation with ADA-Protected Frameworks BCCP™ and B2C3A™ (Public Record Entry: April 4–10, 2025)
Filed for Public Record – Recognition-Only Submission
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Introductory Statement

This analysis documents measurable linguistic and structural convergence between the BHSOAC's 2025 governance framework and the **BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™)** and **B2C3A™ Pipeline Prevention Frameworks** that were entered into the public record in April 2025. The intent is to preserve evidentiary continuity and inform future provenance and authorship review under the **Bagley-Keene Open Meeting Act** and **Title II ADA** participation standards.

1. Pre–BCCP Era (February–March 2025)

Institutional Character

- Agendas emphasized administrative structure, budget allocation, and compliance oversight rather than systems causation or equity integration.
- Behavioral health was framed as a service domain, not as a public system intersecting justice, housing, and mortality.
- Discussions were categorical (wildfire response, Full-Service Partnership reports, school-based screenings) rather than continuum-based.
- "Continuum" appeared only in narrow clinical contexts.
- No reference was made to cross-system linkages that later became central to the BCCP™ architecture.

Examples

- **February 27 2025** – Agenda centered on wildfire response and workforce retention; no mention of structural prevention or systemic convergence.
- **March 26 2025** – Focused on "governance and legal requirements," "team organization," and "portfolio of projects," emphasizing internal management rather than reform or integration.

Summary
Prior to April 2025, Commission discourse reflected operational maintenance and compliance, not systemic reform or continuum integration.

2. Post–BCCP Public Entry (April–October 2025)

The public filing of the **BCCP™** and **B2C3A™** frameworks (April 4–10 2025) correlates with a *documented institutional inflection* in the Commission's governance language and framing.

a. April 24 2025 – Immediate Convergence Window

- Occurred within two weeks of framework entry.
- Introduction of "Caring Moment" language reflecting the BCCP™ framework's human-centered accountability orientation.
- Expansion of Advocacy Spotlights and Peer Respite Concept Paper discussions employing continuum and partnership terminology aligned with B2C3A™.
- Shift in agenda descriptors from "programs" to "frameworks" and "partnership models."

b. May 22 2025 – Systemic Inflection Point

- Agenda items such as "*Full-Service Partnership Grant*" and "*Impacts of Firearm Violence*" incorporated continuum and prevention framing.
- *Innovation Partnership Fund & Public-Private-Nonprofit Partnerships* Discussion introduced systemic-innovation logic parallel to B2C3A™'s Convergent Accountability Architecture.
- Governor's May Revise presented behavioral health as public infrastructure, echoing BCCP™'s prevention-architecture framing first submitted April 10 2025.

c. October 23 2025 – Full Institutional Adoption

- Agenda 11: "Mental Health Wellness Act: California's Crisis Continuum" — first formal use of continuum as statewide governance architecture.
- Agenda 12: "Innovation Partnership Fund Framework Approval" — formal incorporation of framework-based governance language.
- Agenda 18: "Client, Family, and Community Inclusion, Lived Experience, and Diversity Advisory Committee" — reflects B2C3A™ relational-governance principles.

Key Indicator:
By October 2025, *Crisis Continuum* evolved from a discussion topic to a *structural construct* embedded in statewide behavioral-health governance vocabulary.

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3. Structural and Linguistic Comparison

Category	Pre–April 2025	Post–April 2025
Conceptual Language	Administrative, programmatic	Systemic, continuum-based
Governance Framing	Compliance & budgeting	Accountability & convergence
Human-Centered Language	Absent	Introduced ("Caring Moment," inclusion themes)
Innovation Focus	Project-level	Systemic, cross-sector
Use of "Continuum"	Minimal, clinical	Structural, statewide
Cross-System Linkages	Fragmented	Explicit (health–safety–housing)
Framework Formalization	None	*Innovation Partnership Fund Framework*; *Crisis Continuum*
Leadership Tone	Procedural	Integrative, reform-oriented
Public Role	Input	Co-governance and accountability partner

4. Implication: Documented Convergence and Provenance

The record shows a **traceable shift in institutional logic—from administrative oversight to prevention-based systems governance—occurring immediately after the frameworks' public entry.**

Between February and October 2025, BHSOAC materials demonstrate a measurable evolution from compliance to systemic accountability, introducing key conceptual markers—continuum logic, convergence, public inclusion, and human-centered governance—first defined in the BCCP™ and B2C3A™ frameworks.

5. Evidentiary Value

The convergence is both **linguistic** (terminology, framing) and **structural** (agenda design, decision architecture).
It provides public-record evidence of framework adoption and systemic influence consistent with **Government Code § 11120 et seq.** and **ADA Title II** participation standards.
When read in conjunction with *Exhibit Q-T1 (Continuity and Provenance Timeline)*, the analysis confirms authorship provenance and institutional alignment across County and State levels.

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Respectfully submitted,
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