



**PUBLIC COMMENT TO ADDRESS THE BEHAVIORAL HEALTH COMMISSION
September 11, 2025, BHC Annual Retreat**

Commissioners by Supervisorial District

District	1 st	2 nd	3 rd	4 th	5 th
Supervisor	Hilda L. Solis	Holly J. Mitchell	Lindsey P. Horvath	Janice Hahn	Kathryn Barger
Commissioners	Susan Friedman	Kathleen Austria	Stacy Dalglish	Victor Manalo	Lawrence Schallert
	Bennett W. Root, Jr.	Reba Stevens	Thomas Roache	Michael Molina	Brittney Weissman
	Imelda Padilla-Frausto	Erica Holmes	Vacant	Marilyn Sanabria	Vacant

L.A. County Board of Supervisors Member: Supervisor Kathryn Barger

Agenda #	Name	Method used to address the Commission (e.g., By phone, in-person, or email)	Type of Public Comment (e.g., General or Stakeholder Report)	Comments
The following individuals addressed the Commission either in person or by phone during this meeting.				
PLEASE NOTE: The text below has been retrieved from the non-verbatim transcript produced by our live captioning service. For the emailed communication, we have copied the text from the email received and pasted it on to this document.				
Public Comment	Jim "The Hat"	In person	General	Good morning. I appreciate that you referred to September the 11th. The traumatic effect is still going on. People have lost hope to see that this world of 150 wars going on still is (inaudible) JW.Org. Finding peace. This hope can help us stay off the effect of all that trauma. It would help clear the way of seeing forward to a better future. Jw.org we give that hope to help us as community. It is a community effort worldwide. Thank you very much.
Public Comment	Mark Karmatz	In person	General	I have a few. I have some new ones. I haven't been able to mark them down. California memorial will take place on next Monday. It will be at metro state hospital in Norwalk at James Hall. I have a few others. The 15th, there be an emotional connection

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				<p>empowerment and revitalization from the national empowerment center. July 15th. On the internet. Anyone can attend it. Reasonable accommodations. September 9th. 1:00 p.m. That is all I got right now. I can come back with more. Thank you.</p>
Public Comment	Steve McNally	In person	General	<p>Okay. Hello. I am Steve. I live in orange county. I am on a similar board down there. Came to see your retreat. I want to mention a few things. I am speaking as individual. Getting our board to have one voice on any one thing is difficult volunteers. There are a few things that concern me. Yesterday at our meeting, we were told department of health care services has told us that call community will be under public health.</p> <p>There is a wick code that isn't in place yet to run the program. More will be revealed. I have been thinking that the council behavior health field will be the planning council and our boards. I have been asking to get all of us in synced. From the most influential to the largest but less influence. Less conflicted. The expansion of that board has changed, making them more of a working board than a show board.</p> <p>We have 900 plus together and 59 elected. Supervisors that don't see paperwork. People are busy. When you have people who don't make it easy to see stuff, and people are going, I don't think getting services should be so hard. Once you navigated it once or twice, I do it all the time for people.</p> <p>I want to talk about a few issues.</p>

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				<p>VICTOR MANALO: The timer is behind you. It is up. SPEAKER: Can I give four points? VICTOR MANALO: Very quickly, yes. STEVE: Next time. Unspent funds. Across the state, we don't show them as obligated versus not. As a group, we have given up tons of money. Second is when we cancelled the programs locally, even our biggest providers, they don't have a good way to get private money. Figuring HOUT to put grant writing or under writing it, smaller people, can't hire the people. Bigger have been living off the counties. Workforce. Certified peers. 6600 in the state. 65 percent in six counties. They are starting to lapse the certifications. How many are working? What is the plan to use them for the federal funds participation? AB96. A law to allow certify peers, it got put as a two-year bill, to build the community health workers. A much larger managed health care system. Without it, they will be not as meaningful as they could of been. I know you are rough on time. Crisis response. We all understand that if someone involuntary doesn't want to go and it has been assigned, they don't go necessarily. It is a legal issue for the counties. I don't ware who does it. Someone figured it out privately for 1700 bucks. I will work on that across the state. Cultural competency. Meeting in their own languages. I appreciate Victor Manalo for giving me the grace. Thank you.</p>
Public Comment	Anonymous	In person	General	I am a data analyst with the valley community uplift foundation. We are a nonprofit committed to mentoring the youth. We recognized

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				that behavioral wellness starts with safe and empowering environments. We make sure we help fight the stigma faced by underserved communities by providing free sports and community events for young people and their families to come, connect, grow, and thrive. This builds skills and a sense of belonging to community. I am here on behalf of us to say that we are committed to being a part of the solution by uplifting voices that are often left out of the conversation. Thank you.
Public Comment	Ricardo Kim	In person	General	<p>Morning. I am a stakeholder in LA County. I want to thank the lady before me for coming a long way and sharing. Thank you to the gentlemen before for the information. I want to talk about two things that occurred at the KPT meeting on September 9, 2025. Before I start, I want all of us to remember that always give the benefit of the doubt. We are all doing the best we can. Even department. It is tough work. We appreciate them. There will be cracks. People will fall through. They will crack their head over. These are human beings. I am street homeless. We crack our heads a lot.</p> <p>First is after the meeting, on September 9th, I met a cochair from the USC C. I haven't seen anything from there in a long time. I think since 2019 when there was a join summit of the cochairs and the sack at the time cochairs that met in a large room at the old HQ. I said, are you coming to the meeting today. We haven't seen you in a while. There is a retreat. They didn't know about it. One was newly appointed.</p> <p>I asked about the bylaws, the charter, does it say you have to be at the meetings? We want to know our beers and brothers and sisters</p>

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				<p>doing this great work. They didn't know. We took the conversation to this DMH staff person. They said, it is in the charter. I would like to ask the commission to direct the department of mental health to pass out copies to all members. So everyone is on the same page. If they can make it short, that is great. There should be something written where once or twice, the fiscal year, they show up. Second, the housing form for CPT meeting is on 9/29. Only open to 160 people. Members have to wait to get in. Did the department of mental health reach out to people to invite them to a housing forum? We can't go until the 160 members decline to go. They can't go to a housing forum. We are unhoused. We didn't have a chance to go. It says see attached. Can these be attached to the actual minutes. The members can correct it during another session. Thank you very much.</p>
Public Comment	Irene Ratliff	In person	General	<p>Morning. I am Irene. As much as I enjoy coming and visiting, someone asked why do I show up. I show up because I know that there is a line with the department of mental health. It sounds rogue to talk about the brigade. It is simply stating, we can make an alternative to the programs to align some of what I am communicating. What we need outside of, we are mental. We have a dysfunction. We are in the matrix. I said we are on real time. We hear voices. The thing is those voices are hurting us. I am like, I know you feel that fly. I can feel that. We need to construct something policies. Something in place to address sky. I know we rarely talk about ourselves, we need to create policies. There is no way, I should be like, there is nothing going on.</p>

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				<p>Everything is okay. We don't have that brigade to seek policies to talk about reform. We can't say nothing is going on when I am attending sexual assault classes and domestic violence classes. If we were looking at those facts, supremacy. We are looking at Department of Defense. Look at police brutality. I did fete come information in regard to becoming a probation offer.</p> <p>That connection of what I am saying in regards to why the county the court matters in talking about saving our youth to do something other than to sit around waiting on general relief or the little hand down. We need to be employed. Thank you so much.</p>
Public Comment	Elizabeth	In person	General	<p>: I am Elizabeth. We work for the advocacy of criminal justice. Mental health has made a connection with criminal justice. They are not just put into transitional and don't know how to live after. We would like to see mental health create these establishments before they reenter the system. Most is sitting in a jail. They may not have been incarcerated.</p> <p>Instead of housing people in a jail cell, my hope was we make an access center. A large building. They have a furnished bed. We are able to do qualitative research and find some establishment that is in between. I know mental health works now. We haven't seen anything happen so far. It is a reminder that we are here. That is all I have to say.</p>
Public Comment	Yvonne Sandoval	In Person	Stakeholder report: SALT 7	<p>Thank you. I am Ivane and I am still the current salt seven cochair. My partner is not feeling so good. It is her only son's birthday. I want to remind everyone we have a great person. He wants to make</p>

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				<p>sure that we are on all social media platforms. You can find us with LACDMHSA7. For short, this coming Friday, will be our meeting. It starts at 10:00 a.m. we are showing up virtual and in person.</p> <p>We will be at city of Whittier at the wellness center 7643 South Painter Avenue. That is my message. I want to thank all that came and spoke of their passionate projects. Without them being here, I wouldn't know about it either. I appreciate this day. Thank you. We are looking forward to Fall. We just had a beautiful moon.</p> <p>If you felt a little funny or maybe extra energetic, that is why. I know those things now. Thank you. Here we are. Thank you.</p>
Public Comment	Anonymous	In person	General	<p>Good morning everybody, I have 2? I can go by with one. I see one familiar face here and the rest of you are strangers but maybe not by the end of this meeting. I just wanted to mention something about myself, introduce myself more candidly. This might help pursue, the commissions end. First of all, the ivory tower, if you will. I have a Harvard bachelors and earned a PHD from the University of Pittsburgh. That's not all, there's a school of hard knocks, I have a mental health diagnosis, and excuse me this is tough for me, and an arrest record. So when I work with people its typically the ivory tower or the school of hard knocks, not both. Unfortunately. At this time, I am institutionally unaffiliated and semi-retired. As you might have guessed I am financially independent and can do what I want as I please with my time and my energy. I hope that this little bit of introduction provides the general public as well as the commission with some information that might help, again, help further the</p>

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				interest of all of us DMH, the Behavioral Health Commission, we'll see. I basically looking for.....not necessarily a boss, but a cause. Some sort of calling, im in search mode. Than you for your attention.
Public Comment				
Public Comment				
Public Comment				
Emailed Public Comment Correspondence				
Public Comment	Esroruleh Mohammad	E-Mail	General	<p>Hello Commission Staff, For the September 11, 2025 BHC Retreat, please docket the attached recognition-only materials for the public record and circulate to Commissioners in advance of agenda Item 4 (Public Comment) and the Retreat sections on "Progress since the last retreat" and "Creating shared accountability."</p> <p>Requests</p> <ol style="list-style-type: none"> 1. Insert the neutral prior-work acknowledgment in the retreat materials and minutes wherever concepts align with the frameworks: "Prior Work Acknowledgment: Concepts overlap with the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and the B2C3A™ Pipeline Prevention Model (Mohammad; entered into the public record April 10, 2025; U.S. Copyright TXu 2-486-534)."

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				<p>2. Record integrity corrections: a) Please index my April 10 and May 8, 2025 submissions on the BHC page and link them from the July 10 minutes if referenced by discussion. b) Where slides/recordings are not posted, note “No recording/slides were produced for this item” to close the loop for the public.</p> <p>3. ADA accommodation: I request written-only communications for follow-up. Please confirm a single written point of contact.</p> <p>Attached for the record (recognition-only; no methods disclosed; no license granted):</p> <ul style="list-style-type: none"> • 2025-09-11_BHC-Retreat_Written-Submission.pdf (primary filing) • Exhibit_A_Top10_Convergences_BOS_2025-09-02.pdf • Cracking the Code — Provenance and Convergence Record (2025).pdf • Appendix_D_CPRA_Preservation_BHC_2025-01-01_to_Present • Appendix_E_Recognition-Only_Acknowledgment_BHC • Appendix_C_Access_&Transparency_Evidence (A07–A12; available upon request) <p>ADA Note Submitted while on ADA medical leave. This correspondence is provided in my capacity as framework author and member of the public, not in any DMH employment capacity. MHSA Planning and</p>

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				community stakeholders are copied solely for interagency transparency. Respectfully, Dr. Esroruleh T. Mohammad Clinical Psychologist (on ADA medical leave) CARE Court Petitioner Author, BCCP™; Founder, B2C3A™

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Public Comment Submission
Dr. Esroruleh T. Mohammad

Clinical Psychologist (on ADA medical leave)
Author, BCCP™ Framework; Founder, B2C3A™ Model
U.S. Copyright Registration: TXu 2-486-534

Submitted to:

Los Angeles County Behavioral Health Commission (BHC) Retreat
September 11, 2025

Commissioners:

Purpose. This written comment supports your retreat’s themes—“progress since the last retreat” and “creating shared accountability”—by proposing three low-cost, high-impact actions: (1) neutral provenance acknowledgment, (2) record-integrity corrections, and (3) BCCP™ fidelity metrics that operationalize prevention.

Provenance. On April 10, 2025, I formally introduced the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and the B2C3A™ Prevention Model to the Commission. These frameworks are copyrighted (TXu 2-486-534) and were developed to provide prevention-first design, independent oversight, and navigation supports across behavioral health, housing, and justice systems.

Convergence. Since April 2025, independent records (Wayback captures, Board minutes, PRA disclosures) document increasing alignment between County messaging and these frameworks. DMH’s April 16 statements regarding prevention removal under Prop 1 and CBO Medi-Cal certification barriers underscore the need for a coherent prevention architecture and state-level technical assistance.

Requests.

1. Neutral prior-work acknowledgment (recognition-only)
Please include the following line wherever concepts overlap in BHC materials and minutes:
“Prior Work Acknowledgment: Concepts overlap with the BCCP™ and B2C3A™ frameworks (Mohammad; entered into the public record April 10, 2025; U.S. Copyright TXu 2-486-534).”
This preserves provenance without implying endorsement or license.
2. Record integrity and access
 - a) Index and link my April 4, April 10, April 24, May 8, May 22 submissions on the BHC page.
 - b) Where slides/recordings are not available, add a brief note to the agenda page to close the loop for public access.
These steps align with Title II/§504 effective-communication duties.
3. Fidelity metrics: BCCP prevention framework in practice
To move from symbolic adoption to accountable implementation, I ask the Commission

to request the following in staff evaluations you receive:

- Confirm inclusion of disaggregated early-warning indicators (e.g., repeat 5150, unresolved crises) and fidelity to BCCP navigation and diversion (e.g., independent grievance pathways with retaliation safeguards) in evaluations
- State TA progress and CBO Medi-Cal certification timelines
- Quarterly publication cadence aligned to public dashboards

Why it matters. In 2025, families—including my own—experienced program-access failures where CARE Court navigation and crisis response did not materialize despite clear need. Ethical reform requires attribution and fidelity, not just language.

Capacity and ADA. I submit this comment while on ADA medical leave, in my capacity as framework author and member of the public, not in any DMH employment capacity. Please confirm a single written point of contact for ADA follow-up.

Attachments (recognition-only; no methods disclosed; no license granted):

- Appendix C — Access and Transparency Evidence (A01–A12; available on request)
- Appendix D — CPRA/Preservation Notice (BHC)
- Appendix E — Recognition-Only Acknowledgment (BHC)
- Cracking the Code — Provenance and Convergence Record of the BCCP™/B2C3A™ Frameworks (2025)

Respectfully,

Dr. Esroruleh T. Mohammad

Systems Equity Advocate | CARE Court Petitioner

Author, BCCP™; Founder, B2C3A™

TXu 2-486-534 | tamimmohammad@gmail.com

Appendix D – CPRA/Preservation Notice (BHC)

Prepared by: Dr. Esroruleh T. Mohammad, Ph.D.

Copyright: TXu 2-486-534 | Trademarks asserted (™)

To: Clerk of the Behavioral Health Commission (BHC); Commission Chair; Executive Office; County Counsel

From: Dr. Esroruleh T. Mohammad

Date: September 8, 2025

Subject: CPRA Request and Preservation Notice — January 1, 2025 to Present; Rolling Production

Pursuant to the California Public Records Act (Gov. Code §§ 6250–6270) and applicable preservation duties, please preserve and produce records from January 1, 2025 to present (rolling production) relating to Commission proceedings and staff work that reference any of the following terms: “BCCP”, “BureauCare”, “B2C3A”, “pipeline”, “prevention framework”, “postvention”, “navigation”, “equity index”, “displacement index”, “PIVOT”, “IPF”, “ECM”, “governance”, “implementation fidelity”, “Sellers Dorsey”, “Mohammad”, “Esroruleh”, “Tamim/Tamimmohammad”, “TXu 2-486-534”.

Scope includes:

- Agendas, minutes, staff reports, packets, recordings, transcripts, chat logs, handouts, and letters for all BHC meetings, subcommittees, retreats, and related convenings.
- Receipt, processing, and posting of all written and oral public comments, correspondence, and submissions by me since April 4, 2025 (CARE Court Town Hall) to present, including docketing/indexing decisions and posting logs/change logs.
- Communications among Commissioners, BHC staff, BOS offices, CEO, ARDI/Executive Office, CCJCC, DPH, DHS, DHCS, SAPC, DMH liaisons, PPSGC, POC, Executive Office, and County Counsel regarding authorship, attribution, or use of BCCP™/B2C3A™.
- Communications, correspondence, and consultations between BHC and (a) the DMH Director and MHSA Planning; (b) the Board of Supervisors and CEO/Cluster leadership; and (c) state oversight bodies (including MHSOAC) concerning interagency reform, equity, public health frameworks, prevention/postvention, and family navigation.
- Communications, contracts, and briefings with outside consultants (including Sellers Dorsey) related to “system redesign,” “transformation,” or use of the above-referenced terms.

Locations/formats:

Email (inbox/sent/deleted/archives), chats (Teams/Zoom/Slack) and transcripts, calendars/invites, drafts and version history (SharePoint/OneDrive/Google/Box), recordings, whiteboards/notes, local/network drives, backups, and CMS/website publish logs. Please suspend auto-deletion. This hold extends to personal devices/accounts used for public business.

Production:

Please begin rolling production with June–September 2025. Provide searchable PDFs and native

files for slides/spreadsheets with available metadata. Identify custodians and systems under hold, and the date of your 10-day determination and first production.

This notice is for transparency and record integrity; no rights are waived. Please confirm receipt, identify the records officer assigned, and ensure that responsive documents are preserved immediately.

Respectfully,

Dr. Esroruleh T. Mohammad

Clinical Psychologist (on ADA medical leave) | Systems Equity Scholar

Author: BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Prevention Model

U.S. Copyright TXu 2-486-534

tamimmohammad@gmail.com

Appendix E — Recognition-Only Acknowledgment Request (BHC)

Prepared by: Dr. Esroruleh T. Mohammad, Ph.D.

Date: September 11, 2025

Purpose

To request a neutral, recognition-only acknowledgment by the Los Angeles County Behavioral Health Commission (BHC) regarding prior public record submissions of the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Prevention Model (Copyright TXu 2-486-534).

Requested Acknowledgment Language

“Prior Work Acknowledgment: Concepts overlap with the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and the B2C3A™ Pipeline Prevention Model, authored by Dr. Esroruleh T. Mohammad (entered into the BHC public record on April 10, 2025; U.S. Copyright TXu 2-486-534). This acknowledgment preserves provenance only and does not imply licensing, endorsement, or adoption.”

Rationale

1. **Public record continuity:** The BHC was the first County forum where the BCCP™ framework was formally introduced (April 10, 2025), and reaffirmed on April 24 and May 8, 2025.
2. **Transparency:** Acknowledgment ensures that meeting packets, minutes, and derivative policy references maintain integrity of authorship provenance.
3. **Neutrality:** No methods or tools are disclosed; no license is granted. This is process-only.
4. **Equity & compliance:** Recognition supports ADA/§504 effective-communication obligations by ensuring that contributions delivered during medical leave are visible, traceable, and not erased.

Reservation of Rights

All rights reserved. Submission is recognition-only. No waiver of copyrights or ADA/FEHA protections.

From: [Tamim Mohammad](#)
To: [Mental Health Commission](#)
Cc: [ExecutiveOffice](#); [COCO Contact Us](#); [Info LA County](#); [Office of Countywide Communications](#); [Emily Issa](#); [Natalia Victoria](#); [Miguel Chavez](#); [Ada Katz](#); [ceop](#); [D'Artagnan Scorza](#); [CEO ARDI](#); [First District](#); [SecondDistrict](#); [Third District](#); [fourthdistrict](#); [Barbara Ferrer](#); [Gary Tsai](#); [Jackie Contreras](#); [Tamara Hunter](#); [Christina Ghalv](#); [Fesia Davenport](#); [mhsa@dhcs.ca.gov](#); [mhsoac@mhsoac.ca.gov](#); [MHSOAC Public Comment](#); [stateauditor@doj.ca.gov](#); [InspectorGeneral](#); [Probation Oversight Commission](#)
Subject: BHC Retreat (Sept 11) — Recognition-Only Provenance, Record Integrity, and ADA Written Submission
Date: Thursday, September 11, 2025 12:03:46 AM
Attachments: [2025-09-11_BHC-Retreat_Written-Submission.pdf](#)
[Exhibit_A_Top10_Convergences_BOS_2025-09-02.pdf](#)
[Cracking the Code — Provenance and Convergence Record of the BCCP™B2C3A™ Frameworks \(2025\).pdf](#)
[Appendix D — CPRA Preservation Notice \(BHC\) 2025-09-08.pdf](#)
[Appendix E — Recognition-Only Acknowledgment Request \(BHC\).pdf](#)

CAUTION: External Email. Proceed Responsibly.

Hello Commission Staff,

For the September 11, 2025 BHC Retreat, please docket the attached recognition-only materials for the public record and circulate to Commissioners in advance of agenda Item 4 (Public Comment) and the Retreat sections on “Progress since the last retreat” and “Creating shared accountability.”

Requests

1. Insert the neutral prior-work acknowledgment in the retreat materials and minutes wherever concepts align with the frameworks:

“Prior Work Acknowledgment: Concepts overlap with the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and the B2C3A™ Pipeline Prevention Model (Mohammad; entered into the public record April 10, 2025; U.S. Copyright TXu 2-486-534).”

2. Record integrity corrections:
 - a) Please index my April 10 and May 8, 2025 submissions on the BHC page and link them from the July 10 minutes if referenced by discussion.
 - b) Where slides/recordings are not posted, note “No recording/slides were produced for this item” to close the loop for the public.
3. ADA accommodation: I request written-only communications for follow-up. Please confirm a single written point of contact.

Attached for the record (recognition-only; no methods disclosed; no license granted):

- 2025-09-11_BHC-Retreat_Written-Submission.pdf (primary filing)
- Exhibit_A_Top10_Convergences_BOS_2025-09-02.pdf
- Cracking the Code — Provenance and Convergence Record (2025).pdf
- Appendix_D_CPRA_Preservation_BHC_2025-01-01_to_Present

- Appendix_E_Recognition-Only_Acknowledgment_BHC
- Appendix_C_Access_&Transparency_Evidence (A07–A12; available upon request)

ADA Note

Submitted while on ADA medical leave. This correspondence is provided in my capacity as framework author and member of the public, not in any DMH employment capacity. MHSA Planning and community stakeholders are copied solely for interagency transparency.

Respectfully,
Dr. Esroruleh T. Mohammad
Clinical Psychologist (on ADA medical leave)
CARE Court Petitioner
Author, BCCP™; Founder, B2C3A™
TXu 2-486-534 | tamimmohammad@gmail.com

On Fri, Sep 5, 2025 at 9:49 PM Department of Mental Health
<DMH@subscriptions.lacounty.gov> wrote:

NOTICE

Behavioral Health Commission Retreat Flyer - Date: 09/11/2025, Time: 9am, Location: 510 S. Vermont Ave., 9th Floor, Los Angeles, CA 90020

ACCESS OPTIONS:

1. **To watch the live stream**, click this [MS Teams Link](#) or use this shorten link bit.ly/47Aheh3
2. **To listen and to make public comment in English**, please call 844-291-6362, enter participant code 4972277
3. **To listen and to make public comment in Spanish**, please call 323-776-6996, conference ID 444855048
4. **To listen and to make public comment in Korean**, please call 323-776-6996, conference ID 228880303
5. **Live Captioning**

NOTICE: All Commission meetings are recorded (video and audio).

AGENDA

English

Spanish

BH COMMISSION CONTACT INFORMATION

Email: mhcommission@dmh.lacounty.gov

Address: 510 South Vermont Avenue, Los Angeles, California 90020

Phone: 213-948-2463 or 213-947-6487

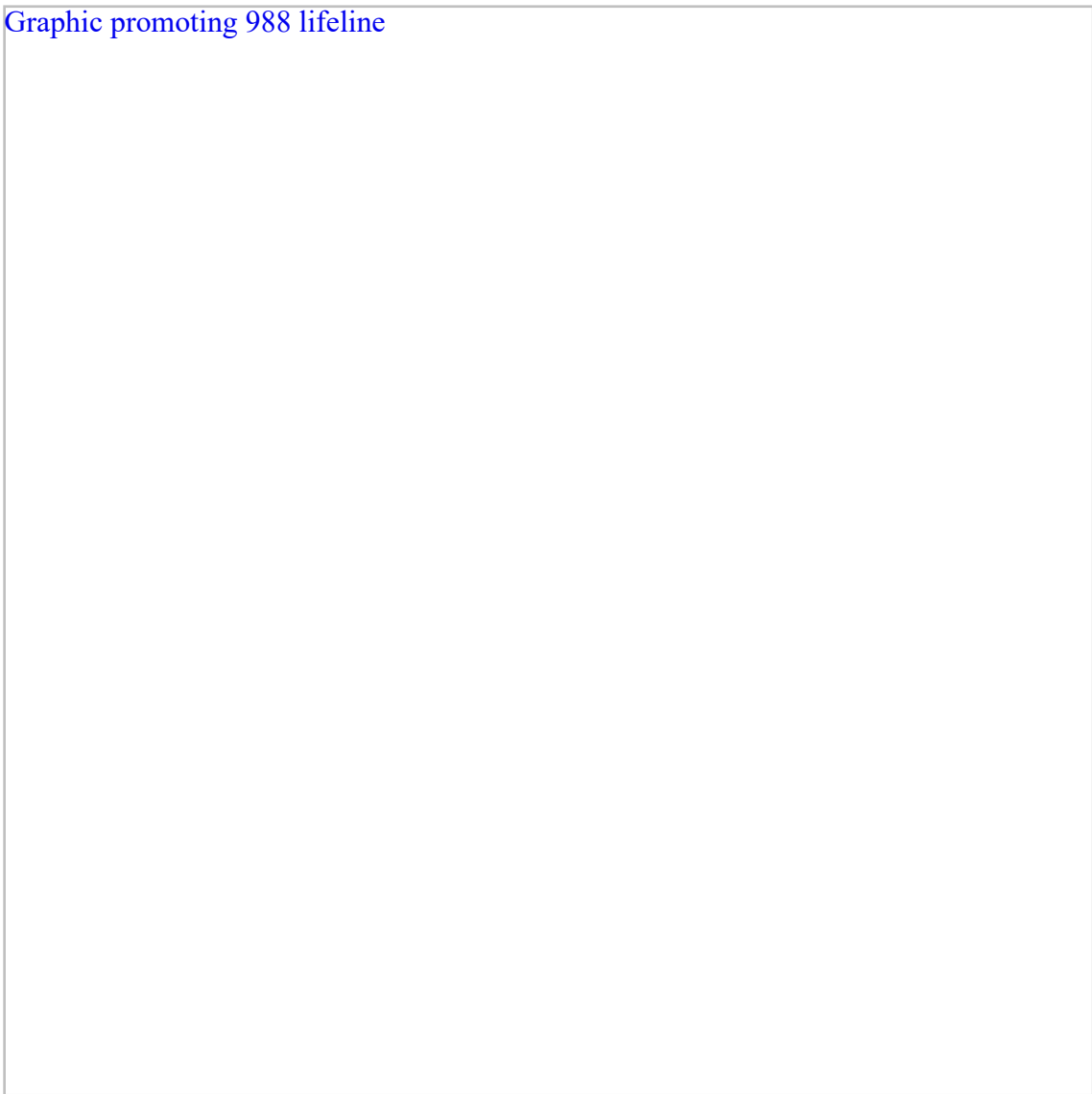
Thank you,

Kenia Fuentes, MPH
Executive Assistant, Behavioral Health Commission
Los Angeles County Department of Mental Health

Graphic promoting 988 lifeline

Mental Health Resources Graphic and Link

Graphic promoting 988 lifeline

A black rectangular area at the bottom of the page. In the center is a white-bordered square containing a small blue square with a white question mark. Below this square, the text "Follow us on social media: @LACDMH" is written in white. Underneath the text are three small white-bordered squares, each containing a blue square with a white question mark, representing social media icons.

Follow us on social media: @LACDMH

Update your subscriptions, modify your password or email address, or stop subscriptions at any time on your [Subscriber Preferences Page](#). You will need to use your email address to log in. If you have questions or problems with the subscription service, please visit subscriberhelp.govdelivery.com.

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This email was sent using GovDelivery Communications Cloud to tamimmohammad@gmail.com on behalf of: County of Los Angeles, California · 500 W. Temple St. · Los Angeles 90012

Cracking the Code: Provenance and Convergence Record of the BCCP™/B2C3A™ Frameworks (2025)

BureauCare™ Systems Equity Frameworks

Prepared by: Dr. Esroruleh T. Mohammad, Ph.D.

Clinical Psychologist (on ADA medical leave) | Systems Equity Scholar

Author: BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Prevention Model

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Purpose of this Brief

This document summarizes the public authorship record and systemic convergence of the BureauCare™ frameworks across Los Angeles County, California state oversight, and national policy contexts. It is provided for preservation, transparency, and recognition-only purposes. Full evidentiary exhibits (A01–A12; Appendices) are preserved and available upon request.

I. Provenance and Authorship

- Developed independently (2013–2025), grounded in clinical science, systems-level analysis, ADA/§504-informed equity design, cross-departmental collaboration, and lived family caregiving and system navigation experience — with explicit inclusion of **postvention and institutional harm aftercare** (suicide, child fatality, and systemic displacement) as a core framework pillar.
- Introduced into LA County public record on April 10, 2025 at the Behavioral Health Commission.
- Extended into state record via MHSOAC testimony on April 24 and May 22, 2025.
- Registered with the U.S. Copyright Office (TXu 2-486-534).
- Ethical baseline: use without attribution or fidelity undermines public trust, violates ADA/§504 program-access protections, and raises legal vulnerabilities.

II. Synthesis of Evidence (Exhibits A01–A12)

Taken together, the evidentiary record establishes:

- **Recognition:** DMH leadership acknowledged and praised frameworks prior to April 2025 (A01–A02).
- **Awareness:** Direct correspondence with DMH Director confirms senior notice of provenance (A03).
- **Provenance:** Frameworks formally entered public record across CARE Court and BHC (A04–A05).
- **Admissions:** County leaders acknowledged prevention removals, state TA gaps, and CBO certification barriers (A07).
- **Omissions:** MHSOAC apology confirms state-level omission of submissions from official record (A08).
- **Suppression:** PRA required to uncover missing slides that mirrored frameworks (A09).

- **Corroboration:** Independent Wayback Machine captures confirm unusual County activity and convergence of dashboards/messaging with BCCP™ principles (A10).
- **Fiscal Convergence:** CEO/HSB Measure A rubric slides (Sept 5, 2025) adopt transparency, equity guardrails, liability-prevention, and rubric-based decision-making—core prescriptive elements of BCCP™/B2C3A™—without attribution (A12).

This layered record substantiates a systemic pattern of omission, distortion, and silent adoption — in violation of ADA, §504, and §1557 duties — now extended into fiscal governance and resource allocation.

III. National and Federal Convergence

- **Aug 11, 2025 — New York:** Assemblymember Zohran Mamdani publicly described systemic “red tape,” siloed governance, and failure loops—diagnostic language that directly mirrors BCCP™ systemic categories.
- **Aug 21–22, 2025 — Federal:** The White House launched the “America by Design” Executive Order, establishing governance cadence, equity-based access metrics, and redesign of bureaucratic processes. These priorities parallel core BCCP™/B2C3A™ principles. While no causation is asserted, the convergence demonstrates simultaneous surfacing of the frameworks’ structural logic across federal, state, and local levels. This alignment validates the frameworks’ scientific grounding and underscores the urgency of formal recognition to ensure attribution and fidelity.
- **Aug 26, 2025 — International:** During PREA oversight discussions, County leaders cited South African oversight models as references for local reform—while omitting frameworks already entered into the County record. This selective external borrowing, coupled with internal exclusion, highlights the ongoing gap between institutional adoption and ethical attribution.

IV. Ethical, Legal, and Historical Significance

- **Ethical:** Silent adoption without attribution distorts provenance and weakens trust.
- **Legal:** Copyrighted frameworks are being applied without license or engagement.
- **Historical:** April–July 2025 marked a documented inflection point: County pivoted to “pipeline” framing immediately after frameworks entered the public record.
- **Scientific:** Frameworks are evidence-based, cross-sectoral, and designed for fidelity-based prevention and postvention.

V. Institutional Harm Aftercare (Postvention)

The BCCP™/B2C3A™ frameworks uniquely integrate both prevention and postvention. While prevention redesigns systems to block the trajectory from care into custody and institutional harm, postvention provides structured, trauma-informed aftercare following suicides, child fatalities, displacement, and systemic breakdowns. The absence of postvention protocols has been a defining failure of California’s behavioral health system.

For example, despite nearly two decades of operation, the Mental Health Services Act (MHSA) has not established a coherent framework for accountability and recovery after preventable tragedies. Los Angeles County's April 4, 2025, \$4 billion settlement over decades of foster care and juvenile hall failures reflects the cumulative cost of institutional silence around harm.

The BCCP™/B2C3A™ frameworks address this gap directly. Suppressing or sidelining licensed clinicians who are mandated to act on these insights risks perpetuating preventable harm. BureauCare's self-preserving rules erase postvention, leaving families, communities, and the workforce to absorb the consequences without systemic correction.

VI. Attribution Protocol (Recognition-Only)

All agencies and partners are requested to use the following neutral acknowledgment line: "Prior Work Acknowledgment: Concepts overlap with the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Prevention Model (Mohammad, April 10, 2025 submission; U.S. Copyright TXu 2-486-534)."

VII. Exhibits and Appendices

Full evidentiary record is preserved and available upon request:

- Exhibits A01–A12 (Jan–September 2025)
- Appendix C: Access & Transparency Evidence
- Appendix D: Wayback Machine Capture Analysis

Legacy Placeholder Statement

The BureauCare™ frameworks represent a decade of independent clinical scholarship and lived caregiving analysis. Their public record convergence across County, state, and federal levels confirms their structural validity. Attribution and fidelity are not optional: they are the ethical, legal, and historical requirements of genuine system transformation.

Exhibit A — Top 10 Convergences Between September 2, 2025 Board of Supervisors Proceedings and BCCP™/B2C3A™ Frameworks

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Purpose

This exhibit preserves provenance and highlights on-record convergence between Board/department statements on September 2, 2025 and the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Pipeline Prevention Model entered into the County record on April 10, 2025. The intent is constructive: to support fidelity between language and practice, ensure historical accuracy, and reduce public safety risk associated with symbolic adoption absent prevention infrastructure.

Definitions

- **Convergence:** The public adoption or replication of BCCP™/B2C3A™ principles—such as structural redesign, lived-experience integration, postvention protocols, navigation, prevention equity, cross-system governance, and removal of bureaucratic barriers—as evidenced by verbatim statements in the County record after April 2025.
- **Recognition-only:** Acknowledgment of prior work and provenance; no operational methods disclosed and no license granted.

Top 10 Convergences (Evidence-Based)

1. **Governance failure and emergency cadence**
BOS Quote: “Fix to this bureaucratic error... correct this bureaucratic disaster.” (Horvath, pp. 213–214)
BCCP/B2C3A: Bureaucratic displacement → prevention-first governance.
Implication: BOS language mirrors BCCP’s diagnosis of governance failures that require structural redesign.
2. **Permanent prevention infrastructure**
BOS Quote: “We can’t start from scratch... we need permanent infrastructure...” (Horvath, p. 150)
BCCP/B2C3A: Permanent infrastructure + ethical navigation.
Implication: Converges with BCCP’s prevention requirement against repeat cycles.
3. **Intake and client flow redesign**
Exec. Quote: “We will have to alter our intake and client flow processes...” (Hundal, p. 30)
BCCP/B2C3A: Navigation ethics + intake harmonization across agencies.
Implication: Direct technical confirmation of BCCP intake diagnostics.

Recognition-Only. No methods/tools disclosed; no license granted.

ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Family Advocate.

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4. **Repeat harm and 5150 churn**
 BOS Quote: “5150... seven times in one month... the way we’re doing it now is not effective.” (Barger/Salas, p. 68)
 BCCP/B2C3A: Early-warning metrics; diversion safeguards.
 Implication: County acknowledges repeat harm — validating BCCP’s prevention-first design.
5. **Housing + services integration**
 BOS Quote: Housing without services “lets people cycle in and out... no solution.” (Mitchell, p. 56)
 BCCP/B2C3A: Housing-health convergence.
 Implication: Consistent with BCCP guardrail against siloed housing.
6. **Equity metrics in practice**
 Exec. Quote: Pathway Home “impact on equity... Equity Index.” (Mahin, p. 79)
 BCCP/B2C3A: Displacement mapping + equity diagnostics.
 Implication: Mirrors BCCP’s displacement/equity tools.
7. **Cross-system provider integration**
 Exec. Quote: HSH to become DMH/SAPC provider; managed care contracting; data systems build-out. (Mahin, p. 99)
 BCCP/B2C3A: Cross-system funding + delivery transformation.
 Implication: Tracks BCCP/B2C3A cross-departmental integration model.
8. **Workforce alignment**
 Exec. Quote: “We don’t have enough staff to operate many small facilities. We need some consolidation.” (Shulz, Sept 2, 2025)
 BCCP/B2C3A: Workforce equity safeguards.
 Implication: Echoes BCCP’s link between equity mandates and workforce protections.
9. **Emergency recognition vs symbolic performance**
 BOS Quote: “In the bureaucratic red tape mess, our emergencies seek to cut through. Every one of these issues has already been recognized by this Board as an emergency.” (Horvath, p. 150)
 BCCP/B2C3A: Critique of symbolic declarations without structural correction.
 Implication: Board’s own framing validates BCCP’s analysis.
10. **Contracting and procurement design**
 BOS Quote: “We are incorporating feedback into draft org charts, building our contracting processes... in close collaboration with partners.” (Mahin, p. 87)
 BCCP/B2C3A: Participatory/co-design requirement.
 Implication: Converges with BCCP’s structural design guardrails.

Recognition-Only. No methods/tools disclosed; no license granted.

ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Family Advocate.

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Appendix A: Historic Admissions

Framing Note: These are not casual observations. They are **admissions by the Board and senior executives** that the County is operating with structural misalignment, symbolic declarations, and reactive governance.

11. Institutional Learning / “Cracked Code”

BOS Quote: “It seems to be—I feel like we cracked a big code.” (Hahn, p. 118)

Admission: Board acknowledges systemic “code” of displacement, echoing BCCP’s pipeline diagnosis.

12. Structural Misalignment / Bureaucare Risk

BOS Quote: Mitchell: “How is the budget process going to meet the needs of the department whose organizational structure is still being finalized?”

Gray: “We’re building the plane as we fly it.” (pp. 106–107)

Admission: Explicit recognition of bureaucare dynamics — launching without structural fidelity.

13. Outcome vs Bureaucratic Replication

BOS Quote: “If all we do is set up a new bureaucratic process, and wash, rinse, repeat, that’s not good enough. We have to be outcome oriented.” (Horvath, p. 100)

Admission: County itself concedes the risk of repeating bureaucratic failure flagged by BCCP.

14. Repeat Harm and System Ineffectiveness

BOS Quote: “I know of people that have been 5150 seven times in one month... the way we’re doing it now is not effective.” (Barger, p. 68)

Salas: “...hopefully one day resolving it.”

Admission: Open acknowledgment of churn and failure — validating BCCP prevention metrics.

Source: Los Angeles County Board of Supervisors Official Transcript, September 2, 2025 (Clerk of the Board digital record). See transcript file:

https://file.lacounty.gov/SDSInter/bos/sop/transcripts/1191448_090225.pdf. Specific timestamps and agenda items for each excerpt are available in the Clerk’s record; a one-page index can be supplied upon request.

Requested Actions (Recognition-Only)

- Docket and index this exhibit with meeting materials.
- Adopt the neutral prior-work acknowledgment line:
“*Prior Work Acknowledgment: Concepts overlap with the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and the B2C3A™ Pipeline Prevention Model (Mohammad; entered into public record Apr 10, 2025; U.S. Copyright TXu 2-486-534).*”
- Publish complete packets, recordings, and links; correct broken access.
- Incorporate disaggregated early-warning metrics and BCCP™ prevention fidelity into program evaluations.
- Preserve this exhibit with the September 2, 2025 record as recognition-only documentation, consistent with ADA medical leave protections.

Recognition-Only. No methods/tools disclosed; no license granted.

ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Family Advocate.

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