PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA

Correspondence Received

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

			The following individuals submitted comments on agenda item:	
Agenda #	**Relate To**	**Position**	**Name**	**Comments**
17.		**Favor**	Ann Dorsey	
			Mayra Lira	Cautious Support
		Other	Esroruleh Mohammad	For the record, this item relates to themes previously addressed in my ADA Title II and Section 504 submissions (Exhibits Q-27 through Q-28) concerning equitable public-access policy, effective communication, and prevention-governance standards. I note that Los Angeles County and its partner agencies continue to integrate language and structural reforms consistent with the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Frameworks, which were formally entered into the public record under ADA accommodation and copyright protection in 2025. This submission contains lived-experience evidence provided solely for compliance and record-continuity purposes. All narrative and analytic content remain the intellectual and experiential property of the author; reproduction or use beyond official proceedings requires written consent and acknowledgment. This item reflects continuity of custody-to-care education integration principles introduced under ADA Title II provenance documentation for the BCCP™ framework. Respectfully, Dr. Esroruleh T. Mohammad, Ph.D. Clinical Psychologist | Systems Equity & Family Advocate Author, BCCP™ (BureauCare-to-Custody-Cemetery Pipeline™) and B2C3A™ (Pipeline Prevention Model) © 2025 Dr. Esroruleh T. Mohammad | U.S. Copyright TXu 2-486-534 Recognition-Only submission under ADA medical-leave protections and the Unified BCCP™ / B2C3A™ Evidentiary Convergence Protocol.
			unknown unknown	I am curious why you don't remove and replace the Chief Probation Officer
		Item Total	**4**	
Grand Total			**4**	

As of: 11/4/2025 3:00:07 PM

Public Comment – ADA Title II Participation and Framework Provenance Notice
Filed under ADA Title II / § 504 as a Unified Provenance Comment applicable to all agenda items reflecting convergence with the BCCP™ / B2C3A™ frameworks.

For the record, this item relates to themes previously addressed in my ADA Title II and Section 504 submissions (Exhibits Q-27 through Q-28) concerning equitable public-access policy, effective communication, and prevention-governance standards. I note that Los Angeles County and its partner agencies continue to integrate language and structural reforms consistent with the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Frameworks, which were formally entered into the public record under ADA accommodation and copyright protection in 2025.

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Respectfully,
Dr. Esroruleh T. Mohammad, Ph.D.
Clinical Psychologist (Involuntary Medical Leave)
Systems Equity Strategist & Family Advocate
Author, *BCCP™ (BureauCare-to-Custody-Cemetery Pipeline™)* and *B2C3A™ (Pipeline Prevention Model)*
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Recognition-Only submission under ADA medical-leave protections and the *Unified BCCP™ / B2C3A™ Evidentiary Convergence Protocol* for provenance continuity.

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November 3, 2025

Dear Honorable Supervisors:

We write to express our cautious support for **Item 17** on the November 4, 2025 Agenda entitled Post-Secondary Education Services in Los Angeles County Probation Department Services. As education attorneys, direct services providers and policy experts who have not only represented court-involved youth for many years, but worked with them directly and advocated at both the state and local levels, we have witnessed the barriers our incarcerated clients face in accessing basic education, especially special education services, as well as post-secondary education services. Both LACOE and Probation have struggled to ensure students' access to education, as thoroughly documented in the Education Justice Coalition's August 2025 report, Who Has the Power? Chronicling Los Angeles County' s Systemic Failures to Educate Incarcerated Youth

Historically, once an incarcerated youth graduates in LA County, LACOE is no longer responsible for the student's continued education; it becomes Probation's duty to facilitate access to college programming. This is true for school districts in the community: once a student graduates from Los Angeles Unified School District, LAUSD is no longer responsible for providing special education services to young people. LAUSD might oversee vocational schools and other postsecondary educational programming, but there are no compulsory education laws that require students to pursue postsecondary education.

In recent years, however, there have been efforts to expand the school district's jurisdiction and responsibility over graduated youth. For example, recent state legislation created an alternate diploma pathway under California Education Code 51225.31 for students with disabilities who would have normally graduated with a certificate of completion. If a student is eligible to take California Alternate Assessment

and the student completes state standards aligned coursework to meet the minimum state graduation requirements under California Education Code 51225.3, then the student can obtain a diploma. Interestingly, students who graduate under this alternate diploma pathway are entitled to continue receiving special education services from the school district until they are 22 years old. That said, there is already a basis for LACOE to continue serving graduated youth with disabilities.

This recent effort to expand the school district's jurisdiction serves to fix a longstanding problem related to educating youth who do not fit the limited one-size-fits-all mold of our education system: these youth are often rushed to graduate so that school districts, including the county office of education, no longer have to serve them. This is made even more complicated by the fact that juvenile court judges often require graduation in order to terminate probation, incentivizing early graduations even when the student could benefit from further education (and special education services). The Committee's proposal might prevent premature graduations if LACOE remains ultimately responsible for the education of incarcerated youth even after they graduate.

Our support for this proposal, as shared above, is cautious given LACOE's role in the County's longstanding failures to educate incarcerated youth. To ensure that this proposal meets its intended goals (to ensure post-secondary education access), the following guardrails are necessary:

1/ There needs to be a community-led mechanism to hold the County, and particularly LACOE, accountable for how they are delivering education services and facilitating education access. There must be a clear commitment from the Board of Supervisors and the Probation Oversight Commission to prioritize ensuring K-12 and post-secondary education access in the juvenile detention facilities. Since the LACOE School Board is elected by the Board of Supervisors and not elected by community members, in contrast to other county school boards, it is imperative that there are meaningful opportunities for community members to advise on and challenge education issues in

these closed facilities.

2/ Since we are removing responsibilities from Probation, their budget and staffing must be downsized. Taxpayers and children should not continue to bear the burden of paying for the County's continued failures to educate and house youth in suitable facilities. This proposal should only be approved if there is a commitment to decrease Probation's budget. If this funding is transferred to LACOE, there is more emphasis on the need for community-led accountability mechanisms over how LACOE spends its budget (in addition to the existing LCAP process).

3/ Probation cannot respond to this proposal by putting up more barriers to education access, which is in stark violation of its legal obligations to facilitate education access. As the proposal makes clear, Probation and LACOE are jointly responsible and must collaborate to facilitate education access. Because Probation controls the movement and control of young people, they control whether students go to class or not. Because Probation controls who enters the facility, they control whether teachers and service providers are able to serve youth. Probation should make it easier for young people to get the education and programming to which they are entitled.

We hope that we can use this moment to strengthen the delivery of both K-12 and post-secondary education. Thank you for your consideration.

Sincerely,

The Education Justice Coalition