OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE

Marc Elrich
County Executive

Tiffany Ward
Director and Chief Equity Officer

MEMORANDUM

April 15, 2025

To: Jennifer Bryant, Director
         Office of Management and Budget

From: Tiffany Ward, Director
         Office of Racial Equity and Social Justice

Re: Racial Equity Impact Assessment (REIA) Supplemental Appropriation (SA) #25-70
         FY25 Operating Budget Montgomery County Public Schools School Safety Grant
         Program ($1,485,840)

I.   **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that *Supplemental Appropriation #25-70 School Safety Grant Program*, which funds school security improvements, has the potential to advance racial equity and social justice for Montgomery County Public Schools (MCPS) students, staff, and visitors. However, while improvements to safety infrastructure can aid in creating a more secure learning environment for students, it also has the potential to exacerbate existing disparities in discipline for students of color. The positive impact of this funding will depend on its implementation, policy guardrails, and oversight around the use of CCTV technology in County high schools.

II. **BACKGROUND:** The purpose of SA #25-70 is to enhance school safety, security, emergency preparedness, and response management at the high school level by purchasing and installing security systems. MCPS received funding through the Maryland School Safety Grant Program (SSGP) to design and install security systems.[1] The enhancements are meant to address school safety concerns and challenges following ongoing incidents within the school system. The funding will focus on utilizing closed-circuit television (CCTV) systems, which, according to MCPS, are intended to help identify students and

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[1] The SSGP is a non-competitive, state-funded grant for capital improvements in local schools within the State. Available at: https://schoolsafety.maryland.gov/Pages/RES-Grants-SSGP.aspx

Office of Racial Equity and Social Justice
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individuals involved in bullying and criminal activity, including vandalism, trespassing, theft, drug use or possession, weapons possession, and other related incidents.

According to the National Center for Education Statistics (NCES) School Survey on Crime and Safety (SSOCS), 92.6% of US public schools utilized security cameras to monitor the school in 2021-2022.[2] Specifically, 97 percent of secondary and high schools used security cameras.[3] Notably, security cameras have advanced as technology has advanced. Originally analog, CCTV technology has evolved to encompass broader digital video surveillance systems through the use of internet protocol (IP) based cameras with network capabilities. The Partner Alliance for Safer Schools (PASS) notes this evolution, stating "As surveillance technology has advanced, so have capabilities that allow security professionals to leverage video as a proactive tool to help mitigate risks before and as they occur."[4] It is unclear whether the school system's planned improvements are solely for more traditional analog CCTV or include the broader use of digital security camera systems.

III. **ANALYSIS**: MCPS provided information identifying the ways in which CCTV technology improvements could advance racial equity and social justice.

- *MCPS has found that functional closed-circuit television camera systems have proven to be an asset and prevention strategy when it comes to identifying incidents of bullying and criminal activity, including assaults of all types, vandalism, thefts, drug use/possession, weapons possession, trespassers, and other related incidents.*

- *These funds will be utilized for new closed-circuit television camera equipment, which will enhance security and reduce the misidentification of individuals who are alleged to threaten the safety and security of all.*

The grant will provide resources to improve security systems at eleven high schools in the school system. Funding is allocated among schools with varying race, ethnicity, and socioeconomic characteristics, as indicated by demographic data, Free and Reduced-Price Meals (FARMS), and English Language Development (ELD) participation information in the following table.

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[2] National Center for Education Statistics. Fast Facts. Available at: https://nces.ed.gov/fastfacts/display.asp?id=334.
[3] Ibid.
[4] Partner Alliance for Safer Schools. Safety and Security Guidelines. 6th Edition. 2023. Available at: https://passk12.org/wp-content/uploads/2023/03/PASS_SAFETY_AND_SECURITY_GUIDELINES_6th_Ed_rev.3-21-23.pdf

2024-2025 Demographic Characteristics of School Safety Grant Program Schools

Schools	Asian	Black/African American	Hispanic/ Latino	White	Two or More Races	Participate in Free and Reduced-price Meals System (FARMS	Participate in English Language Development Studies (ELD)
Montgomery Blair	10.3%	24.7%	38.1%	22.1%	4.6%	42.7%	19.6%
James Hubert Blake	10.3%	38.9%	35.1%	11.0%	4.4%	51.2%	12.9%
Albert Einstein	6.9%	16.1%	48.4%	23.5%	23.5%	42.5%	21.0%
Walter Johnson	12.9%	15.8%	19.2%	44.9%	6.8%	18.2%	6.5%
Col. Zadok Magruder	11.7%	19.2%	43.8%	20.9%	4.3%	45.4%	17.3%
Paint Branch	9.5%	58.0%	26.6%	3.4%	2.3%	53.9%	10.7%
Sherwood	11.2%	18.2%	19.4%	45.2%	5.8%	20.2%	4.3%
Springbrook	10.3%	36.7%	45.6%	4.4%	2.8%	58.3%	22.8%
Wheaton	9.3%	19.5%	58.9%	9.8%	2.3%	52.9%	23.0%
Walt Whitman	16%	5.9%	12.6%	56.7%	8.6%	6.3%	2.2%
Thomas Edison High School of Technology*	5.4%	22.4%	52.9%	17.0%	≤5.0%	50.5%	≥95.0%

Based on 2021-2022 data

Source: Data on MCPS student demographics and service group characteristics is available here: https://www.montgomeryschoolsmd.org/departments/planning/cipmaster.aspx and https://ww2.montgomeryschoolsmd.org/departments/regulatoryaccountability/glance/currentyear/schools/04748.pdf

REIA #22-83-School Safety Grant Program

In July 2022, ORESJ completed REIA#22-83, School Safety Grant Program, which was an earlier iteration of this funding request.[5] The grant awarded MCPS funds to purchase automated external defibrillators, two-way radios, and equipment to assist deaf and hard-of-hearing students during an emergency, as well as closed-circuit video systems for elementary schools. The REIA discussed the Final Report School Safety & Security, which detailed seven key priority areas for enhancing systemwide school safety and security, a 45-day Action Plan, and a safety and security strategic plan and how the grant funding would assist the school system in achieving its safety goals.

Priority Area #3 of the report focused on the need for enhanced communication systems as well as technology and security cameras and included a recommendation to "Develop a systemwide strategy for prioritization, placement, maintenance, upgrades, and most-effective use of security cameras and other technology in schools, led by DSSS." Unlike REIA 22-83, which was unclear which elementary schools would receive funding for CCTV systems, MCPS provided the specific high schools that were awarded funding. However, it remains unclear how the schools were selected and the extent of increased CCTV or camera infrastructure.

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[5] https://www.montgomerycountymd.gov/ore/Resources/Files/22-83.pdf

The following analysis from this assessment remains relevant to the current REIA.
Closed-circuit video system: Related to the purchase of a closed-circuit video system for elementary schools mentioned in SA#22-83, it is unclear which schools will receive this technology and how they were selected. As ORESJ has articulated in previous REIAs, the lack of transparency around these decisions is inherently inequitable as it presumes student opportunities and resources are equal across schools, which data[6] suggests this is not true, particularly in the case of school discipline[7] disparities[8]— which is often considered along with school safety. In addition, the final school safety and security report emphasizes the importance of considering evidence-based research (in addition to alternatives and selection criteria)[9] in the use of security cameras. A Principles for School Safety, Privacy, and Equity statement endorsed by 40 disability and gun safety advocates supports this type of continued attention. The statement calls for clear policies regarding[10]:

- *What data is collected, who has access, how the data will be used, and when it will be destroyed;*

- *How to act upon data collected through the surveillance of students;*

- *Sharing data, especially if data will be shared with law enforcement or others outside of school, with clear responsibilities and accountability as well as consequences for those who violate these data sharing protocols; and*

- *Transparency to educators, parents, and students.*

Researchers and advocates also share the limitations and unintended consequences of certain security measures in schools, particularly on racial inequities and implicit racial bias[11]. According to the National Association of School Psychologists (NSAP), there's no clear evidence that the use of measures such as metal detectors, security cameras, or security guards in schools is effective in preventing school violence[12]. NASP also raises concerns that surveillance cameras in schools may have

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[6] Elaine Bonner-Tompkins, Ph.D. Office of Legislative Oversight. Montgomery County, MD. MCPS Performance and Opportunity Gaps. Report No. 2019-14. December 3, 2019. Available at:
https://www.montgomerycountymd.gov/OLO/Resources/Files/2019%20Reports/OLOReport2019-14.pdf

[7] Elaine Bonner-Tompkins, Ph.D. and Theo Holt, Ph.D. Office of Legislative Oversight. Montgomery County, MD. Racial Equity and Social Justice Impact Statement. Bill 46-20. December 7, 2020. Available at:
https://www.montgomerycountymd.gov/OLO/Resources/Files/resjis/2020/RESJ-Bill46-20.pdf

[8] Osher, D., Fisher, D., Amos, L., Katz, J., Dwyer, K., Duffey, T., & Colombi, G.D. (2015). Addressing the root causes of disparities in school discipline: An educator's action planning guide. Washington, DC: National Center on Safe Supportive Learning Environments. https://safesupportivelearning.ed.gov/sites/default/files/15-1547%20NCSSLE%20Root%20Causes%20Guide%20FINAL02%20mb.pdf

[9] Jack R. Smith, Ph.D. Montgomery County Public Schools. Final Report School Safety & Security. April 2018. Available at:
https://www.montgomeryschoolsmd.org/uploadedFiles/departments/security/SecurityReport/0900.18_SchoolSafetySecurity_FINALREPORT_totalweb.pdf

[10] Student Privacy Compass. Principles for School Safety, Privacy, and Equity. March 2019. Available at:
https://studentprivacycompass.org/wp-content/uploads/2019/03/TO-POST-Principles-for-School-Safety-Privacy-EquityLogos.pdf

[11] Jason P. Nance. Student Surveillance, Racial Inequalities, and Implicit Racial Bias. Emory Law Journal. 2017. Available at: https://scholarship.law.ufl.edu/cgi/viewcontent.cgi?article=1793&context=facultypub

[12] National Association of School Psychologists. (2018). School security measures and their impact on students [Research summary]. Bethesda, MD: Author. Available at:
https://www.nasponline.org/Documents/Research%20and%20Policy/Research%20Center/School_Security_Measures_Imp

*the effect of simply moving incidents of misconduct to places in or outside schools that lack
surveillance[13], thus doing little to curtail misbehavior or improve school safety.*

In addition to NASP's research, studies on the school-to-prison pipeline are also relevant
when examining the use of surveillance technologies in high schools.   The 2017 study by
Jason Nance, titled "Student Surveillance, Racial Inequalities, and Implicit Racial Bias,"
also referenced in REIA 22-83, provides empirical evidence showing that schools primarily
serving students of color tend to implement more intense surveillance measures compared
to other schools. Evidence presented in his study also suggests "that these racial disparities
may not be justified by legitimate safety concerns." [14] He also examines how implicit racial
bias may influence school officials' decisions to utilize intense surveillance methods.[15]

Nance's findings align with the Office of Legislative Oversight (OLO) Report 2023-6,
Addressing Racial Inequity in the School-to-Prison Pipeline,[16] which examines several
racialized gaps created by contemporary racial inequities in schooling and policing,
including the "Discipline Gap". The Discipline Gap refers to the differential treatment of
Black, Indigenous, Latinx, and multiracial students in school discipline.[17] The Gap
illustrates how implicit bias, the criminalization of student behavior, and the presence of
police in schools increase the risks for Black, Indigenous, and People of Color (BIPOC)
students to enter the school-to-prison pipeline.[18]

Nance's study further supports this, noting that when surveillance technology is
implemented without appropriate safeguards, it can amplify these existing disparities.
These disparities create more opportunities for disciplinary actions that disproportionately
affect BIPOC students. Nance also emphasizes that heightened surveillance measures can
"foster distrust, generate feelings of alienation, and undermine the climate of inclusion,"
which negatively affects students' educational experiences and perpetuates racial
inequalities in the education system.[19]

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[13] National Association of School Psychologists

[14] Jason P. Nance. Student Surveillance, Racial Inequalities, and Implicit Racial Bias. Emory Law Journal. Available at:
https://scholarlycommons.law.emory.edu/cgi/viewcontent.cgi?article=1093&context=elj

[15] Ibid.

[16] Elaine Bonner-Tompkins, Ph.D. Office of Legislative Oversight. Montgomery County, MD. Addressing Racial Inequity in
the School to Prison Pipeline. Report 2023-6. June 27, 2023. Available at:
https://www.montgomerycountymd.gov/OLO/Resources/Files/2023_reports/OLOReport2023-6.pdf

[17] Ibid.

[18] Ibid.

[19] Jason P. Nance.

Bill 4 -25 Surveillance Technology - Acquisition and Use by the County
Recently, legislation has been introduced that would establish a transparent process for the
County to acquire and use surveillance technologies, which include CCTV technology.[20]

The proposed legislation would:

> (1) require the submission of impact reports, and the adoption of regulations,
> prior to the acquisition, funding, or use by the County of certain surveillance
> technology;
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> (2) limit the acquisition and use of facial recognition technology by the County
> consistent with state law;
>
> (3) require annual reports and public hearings regarding surveillance
> technology; and
>
> (4) generally amend the law regarding the acquisition, funding, and use of
> surveillance technology by the County.

OLO completed a Racial Equity and Social Justice Impact Statement (RESJIS) that noted
the legislation's positive impact. The analysis stated that Bill 4-25 could "mitigate the
harms of surveillance technologies on BIPOC community members."[21] If adopted, the
agencies subject to this legislation are limited to County departments and offices. However,
MCPS could adopt similar practices to ensure transparency in CCTV and security system
implementation and address concerns related to civil rights and civil liberties.

Other Relevant REIA's and Analysis

ORESJ has also conducted REIAs related to the disproportionate impacts of recording and
surveillance technologies. Research and analysis within these REIAs continue to recognize
the County's public safety responsibilities while encouraging the judicious application of
technologies to safeguard against over-policing and discrimination. The findings in these
REIAs are relevant to monitoring how the installation of security cameras at high schools
will deter bullying and criminal activity and whether there are any unintended disparate
impacts. The full analysis is available in the following REIAs.

- REIA #24-54 Bethesda Parking Security Camera Surveillance System ($2,008,000)
  #24-57 Wheaton Parking Security Camera Surveillance System ($339,000) #24-58
  Silver Spring Parking Security Camera Surveillance System ($2,418,000)
  https://www.montgomerycountymd.gov/ore/Resources/Files/24-54-24-57-24-58.pdf

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[20] Wellons, Christine. Bill 4-25 Surveillance Technology - Acquisition and Use by the County-Public Hearing. March 2025.
Available at: https://apps.montgomerycountymd.gov/ccllims/DownloadFilePage?FileName=2857_1_26069_Bill_4-
25_Publichearing_20250318.pdf
[21] https://www.montgomerycountymd.gov/OLO/Resources/Files/resjis/2025/Bill4-25.pdf

- REIA 25-44 Bureau of Justice Assistance FY24 Matthew Shepard and James Byrd, Jr. Hate Crimes Program Award
https://www.montgomerycountymd.gov/ore/Resources/Files/25-44.pdf

cc: Thomas W. Taylor, Superintendent, Montgomery County Public Schools
Tricia Swanson, Director, Strategic Partnerships, Office of the County Executive