



MONTGOMERY COUNTY OFFICE OF RACIAL EQUITY & SOCIAL JUSTICE

REIA #26-40

Public Safety Joint Operations Center

Requesting Agency/Department(s)

Department of Emergency Management and Homeland Security

Dollar Amount

\$2,439,000

Funding Source

Recordation Tax/GO Bonds

Finding

The Office of Racial Equity and Social Justice (ORESJ) finds that Supplemental Appropriation #26-40 for the Public Safety Joint Operations Center and its potential to advance racial equity and social justice in the County are inconclusive. This project would renovate space in the Public Safety Headquarters and has the potential to improve efficiency and enhance service delivery in response to emergency incidents, as well as to improve coordination among County public safety agencies. However, based on the available information, there do not appear to be safeguards in place regarding surveillance technologies, the permitted uses of shared information, or the explicit application of a racial equity lens and civil liberties assessment during the center's implementation and ongoing operation. The absence of these considerations could exacerbate disparities and disproportionalities in public safety and policing outcomes for communities of color. Given the lack of clarity about the community's role in the project's origins, baseline equity assessments of existing operations, and comprehensive safeguards related to the ongoing acquisition of surveillance capabilities, it is difficult to assess whether this supplemental appropriation will strengthen or weaken efforts to advance racial equity and social justice.

Background

Purpose

The purpose of SA #26-40 is to fund improvements in the Public Safety Headquarters (PSHQ) building and create a shared space for a Public Safety Joint Operations Center (PSJOC)

Racial Equity Impact Assessment (REIA)

Supplemental Appropriation (SA) #26-40 Public Safety Joint Operations Center Page 2

comprised of supervisors and analysts from the Montgomery County Police Department (MCPD), Fire and Rescue Service (MCFRS), and the Office of Emergency Management and Homeland Security (OEMHS). The supplemental funding would provide resources to renovate the space, which is currently used for storage, and make upgrades to house personnel and infrastructure, including radio infrastructure, information technology connectivity (cabling, switches, ports), electrical expansion, a video wall, modular furniture, and extend existing software licenses to additional users.

While the funding request is for physical site renovations, the project aims to improve government efficiency, enhance service delivered to the public, and better protect responders by enabling collaboration and cross-disciplinary coordination in response to emergency incidents. Specifically, the PSJOC will include the Police Operations Center, Real Time Intelligence Center (RTIC), Drone as a First Responder (DFR), Fire and Rescue Operations Center, Emergency Medical Services Transport Disposition Officer, Emergency Management and Homeland Security Situational Awareness Watch Desk, Resource Management System, and Public Warning System.

Relevant REIAs and Other Assessments

ORESJ has conducted REIAs since 2021. The following REIA(s) and Racial Equity and Social Justice Impact Statements (RESJIS) are related to data collection and sharing, as well as policing, and surveillance technologies, all of which are relevant to supplemental appropriation #26-40 - Public Safety Joint Operations Center.

- REIA #22-25 - National Capital Area Law Enforcement Information Exchange Program
<https://www.montgomerycountymd.gov/ore/Resources/Files/22-25.pdf>
- REIA #23-69 - 6th District Police Station
<https://www.montgomerycountymd.gov/ore/Resources/Files/23-69.pdf>
- REIA #23-94 - Public Safety Communications Center Phase II
<https://www.montgomerycountymd.gov/ore/Resources/Files/23-94.pdf>
- REIA #24-21 - Drone as First Responder Pilot Program
<https://www.montgomerycountymd.gov/ore/Resources/Files/24-21.pdf>
- REIA #24-54, 24-57, 24-58 - Parking Security Surveillance System
<https://www.montgomerycountymd.gov/ore/Resources/Files/24-54-24-57-24-58.pdf>
- RESJIS Bill 4-25 - Administration - Surveillance Technology - Acquisition and Use by the County
<https://www.montgomerycountymd.gov/OLO/Resources/Files/resjis/2025/Bill4-25.pdf>

Racial Equity Impact Assessment (REIA)

Supplemental Appropriation (SA) #26-40 Public Safety Joint Operations Center Page 3

- RESJIS Bill 14-22 - Police – Private Security Camera Incentive Program – Established <https://www.montgomerycountymd.gov/OLO/Resources/Files/resjis/2022/Bill14-22.pdf>

Analysis

The PSJOC project would integrate personnel from multiple public safety disciplines into a shared space. While emergency medical, fire, and emergency management coordination offer potential benefits for service delivery, the integration of enhanced surveillance capabilities raises concerns about racial equity, social justice, and civil liberties. Enhancements that include real-time crime centers and other artificial intelligence policing tools, aerial surveillance programs, cross-agency data sharing, and enhanced monitoring capabilities could have unintended consequences for communities of color, potentially resulting in increased contact with law enforcement officers and over-policing. While the planned PSJOC would create efficiencies and improve collaboration, as noted in previous REIAs, “it is ultimately the policies, practices, procedures, and culture of [public safety departments] that will impact individuals’ experiences.”¹

Areas of Concern

Based on the current project details and outside research, four areas of concern have emerged that merit further attention, consideration, or clarification for decision-makers:

- I. A baseline assessment of policing technologies is needed, and their use should not extend beyond their approved scope
- II. Emergency response infrastructure should not be repurposed for surveillance purposes
- III. Measures and safeguards to ensure racial equity, social justice, and civil liberties should be in place
- IV. Ideally, resources should align with documented community needs across all public safety disciplines within the County

Impact Assessment and Scope Expansion

Several assessments completed by ORESJ and OLO have discussed the racial equity implications of increased use of drone technology, as well as the deployment of other policing technologies. Notably, REIA #24-21 - Drone as First Responder Pilot Program – recommended that the County take a cautious approach to using drone technology, in line with the American Civil Liberties Union (ACLU) recommendation to wait until more information became available on how existing drone-as-a-first-responder programs play out in communities before expanding

Racial Equity Impact Assessment (REIA)

Supplemental Appropriation (SA) #26-40 Public Safety Joint Operations Center

Page 4

or augmenting programs. The same caution is recommended before integrating police technology programs into the PSJOC.

REIA #24-21 also cited the RESJIS for Bill 14-22 Police, Private Security Camera Incentive Program, highlighting concerns about policing, surveillance, and racial inequity. It noted that increased community surveillance may disproportionately affect Black and Latinx residents, widening existing racial disparities in law enforcement interactions. The RESJIS advocated using Laura Moy's taxonomy to evaluate new police technologies through an equity lens.

Additionally, REIA #24-54, 24-57, 24-58 - Parking Security Surveillance System discussed the County's Real Time Intelligence Center (RTIC), which could potentially interface with County parking surveillance systems. RTIC accesses and integrates information from various technologies, systems, and software to enable surveillance monitoring, data analysis, and information sharing. The REIA also noted that MCPD has adopted several policing and surveillance technology policies, including Automatic License Plate Recognition System; Electronic and Photographic Surveillance Equipment; Use of Facial Recognition Technologies; and Unmanned Aircraft Systems (Drones).

To date, the Real-Time Intelligence Center has not received a racial equity assessment, as it was piloted and expanded using existing resources rather than through a supplemental appropriation, which could have resulted in a REIA. The PSJOC project would integrate and expand these operations but would do so without the completion of a baseline equity evaluation. If adopted, Bill 4-25 could provide the County with an avenue to conduct a formal assessment of the program, as the legislation establishes a transition process for surveillance technologies acquired after 2020 but before the bill's effective date.²

Safeguard measures, however, were included in County Council Resolution #24-21³, which approved supplemental funding to pilot the DFR program. Those guardrails were extended in Resolution #20-820, which approved funding for the FY26 Operating Budget. The current drone policy limits use to reactive, mission-specific deployment. Guardrails were also established to prevent the DFR program from being used for proactive surveillance. The budget resolution included the following language to continue safeguards measures for the DFR program.

The Council is committed to safety, transparency, and protecting community members' civil rights.

For FY 2026, the Police Department's Drone as First Responder program will adhere to MCPD Policy FC460, and it will:

- a) Not engage in general surveillance;

Racial Equity Impact Assessment (REIA)

Supplemental Appropriation (SA) #26-40 Public Safety Joint Operations Center Page 5

- b) Not use facial recognition technology for recordings or images;
- c) Not operate during events related to first amendment rights unless responding to an appropriate service call;
- d) Ensure data collection and record keeping capabilities are fully functional for each site, and before each new site begins operations, and if collecting and publishing specified flight data on a daily basis is not possible, the DFR will not be deployed;
- e) When enroute to and from a call, ensure the cameras are pointed upward to the sky and not recording anything below unless necessary to effectively respond to the call for service;
- f) Provide regular pilot program updates to the Council and notify the Council of any planned changes that materially impact program operations or data collection, before changes are put in place;
- g) Not respond to calls for incidents that occurred earlier, and there are no immediate safety concerns on scene;
- h) Not to be used to respond to the following types of service calls:
 - i. Noise complaints;
 - ii. Parking complaints;
 - iii. Animal-related calls;
 - iv. Found or lost property; and
- i) Ensure any civilian complaints are referred to the Police Accountability Board.

As noted in previous assessments, there is a growing trend of County investment in technologies such as license plate readers, facial recognition, drones, and other surveillance equipment to address public safety concerns. In a 2025 study, the National Institutes of Health Center for Biotechnology Information notes, “concerns have been raised that RTCCs could lead to surveillance overreach and the erosion of privacy rights, along with the increased monitoring of individuals and over-policing.”⁴ Consolidating drone operations and RTIC into a joint center with police, fire, and rescue, and emergency management operations could lead to pressure to expand their use. The care and protection of the data generated by this system are also critical to reducing the potential for inequities or misuse by external stakeholders. This is echoed in available ACLU guidance.

Protocols are needed to limit the expansion of the project without prior approval, including the acquisition of new technologies and any changes to policy or scope. Questions remain about how emergency response data will be used by law enforcement in heightened situations or during emergencies, and whether it will be shared to influence algorithms or trigger law enforcement actions. Clear policies are needed to prevent law enforcement from using footage collected during emergency or fire operations, and to prevent the PSJOC from acquiring new

Racial Equity Impact Assessment (REIA)

Supplemental Appropriation (SA) #26-40 Public Safety Joint Operations Center Page 6

surveillance technologies without separate legislative approval or an equity assessment.

Adoption of Bill 4-25 - Administration - Surveillance Technology - Acquisition and Use by the County would help in this regard.

Racial Equity, Social Justice, and Civil Liberties Safeguards

As the center is developed, it is important to approach the process with a focus on racial equity, social justice, and the protection of civil liberties. Ensuring diverse staff representation will help ensure all voices have an opportunity to shape the policy and practices of the PSJOC. The following measures may also be useful in developing the PSJOC.

First, ensure that all staff working in the PSJOC complete the 8-hour racial equity and social justice training requirement. ORESJ offers two mandatory sessions for all County employees: "Advancing Racial Equity and the Role of Government" and "Understanding Structural Racism in Montgomery County." While the requirement applies to all County employees, expedited compliance is particularly important for all personnel serving in the PSJOC to enable a baseline understanding of structural inequities and the government's role in advancing racial equity and social justice. Additionally, extending participation in the Community Informed Law Enforcement Seminar (CILES), created through Bill 17-21, Community Informed Police Training, may help expand the PSJOC's knowledge base. The training is geared toward new law enforcement officers and includes lessons on active listening and conflict resolution, community policing, civic engagement, health and wellness, policing history, and racial equity and social justice. It could be beneficial to expand this training to include other participating departments and cover civil liberties and privacy protections as well.

Additionally, community input should be sought, along with a mechanism for oversight. Questions remain regarding the immediacy of creating the PSJOC and whether it was a priority identified by the community, including public safety-related Boards, Committees, and Commissions (BCC). Has feedback been sought from these groups on establishing the PSJOC? The County could solicit input from County BCCs, including the Criminal Justice Coordinating Commission, the Fire and Emergency Services Commission, the Policing Advisory Commission, and the Racial Equity and Social Justice Advisory Committee, as well as from the broader community.

Finally, reporting would help create transparency and show the PSJOC's impact, both positive and negative, on communities of color. Potential metrics might include deployment patterns, disparities in contact, community satisfaction, and tracking improvements in response times for underserved communities, especially for fire and emergency medical services. The City of Seattle's Equity, Accountability, and Quality (EAQ) framework, which uses statistical data to

Racial Equity Impact Assessment (REIA)

Supplemental Appropriation (SA) #26-40 Public Safety Joint Operations Center Page 7

monitor racial disparities to “actively manage the balance between crime control and civil liberties and examine the total cost of ownership of public safety,”⁵ may serve as a useful reference.

Project Rationale, Community Need, and Resource Allocation

The allocation of tax-supported resources for this project raises questions around efficiency and community priority. As discussed above, the DFR and RTIC programs have produced little data on efficiency. The Brennan Center for Justice recommends that there should be preliminary “mandatory efficacy testing to demonstrate that high-impact AI systems work for stated purposes.” The Center adds that Departments should publish the results of any efficacy testing.⁶

Questions regarding the need for creation of the PSJOC remain, including:

- Have the efficiency claims been sufficiently substantiated?
- Is there documented reporting of coordination failures or inefficiencies?
- How will the co-location of supervisors and analysts differ from current business operations arrangements aside from proximity?
- How will success be measured and defined?

According to OEMHS, “one of the main objectives of the center is to implement countywide system status management, wherein resources are dynamically deployed based on call volume and unit availability in order to ensure equitable resource allocation to meet response standards uniformly across the county.” Given that resource distribution and quicker response times in underserved communities are identified as areas for improvement, these changes should have measurable outcomes, supported by baseline data and transparent reporting.

This assessment acknowledges that emergency response coordination can reduce service gaps, ultimately saving lives and protecting communities. However, resource investments in enhanced surveillance and coordination require heightened scrutiny. This project proposes formalizing and strengthening operations that have not been assessed for racial equity or civil liberty impacts, nor have a discernible and demonstrated connection to community need. The questions raised in this assessment may help decision-makers ensure this project achieves its stated goals while protecting civil liberties and promoting equitable public safety outcomes across the County.

Caveats

This REIA has been conducted with the best available information at the time of writing, including department responses to the Racial Equity and Social Justice template and research conducted by ORESJ Policy Team Analysts. While the assessment examines specific racial equity and social justice impacts of the funding request, it cannot fully address all systemic inequities that affect the communities in question, nor do we seek to examine impacts outside the scope of the funding request. We recommend using this assessment as a starting point for discussions about the impact of the program on advancing racial equity and social justice in Montgomery County.

References

¹ REIA #23- 69— Amendment to the FY23-28 Capital Improvements Program for the construction of a new 6th District Police Station. Available at: <https://www.montgomerycountymd.gov/ore/Resources/Files/23-69.pdf>

² Bill #4-25 - Surveillance Technology - Acquisition and Use by the County. Available at: https://apps.montgomerycountymd.gov/ccllms/DownloadFilePage?FileName=2857_1_26069_Bill_4-25_Publichearing_20250318.pdf

³Resolution #20-317 - Supplemental Appropriation #24-21 to the FY24 Operating Budget Drone as First Responder Pilot Program, \$350,000. Available at: https://apps.montgomerycountymd.gov/ccllms/DownloadFilePage?FileName=12008_1_25341_Resolution_20-317_Adopted_20231107.pdf

⁴ Haley P. May 2025. The Impact of Biometric Surveillance on Reducing Violent Crime: Strategies for Apprehending Criminals While Protecting the Innocent. Available at: <https://pmc.ncbi.nlm.nih.gov/articles/PMC12116099/>

⁵ Seattle EAQ Evaluation Final Report. March 2023. Available at: <https://www.seattle.gov/documents/departments/communitypolicecommission/consent%20decree/2023/march%202023%20seattle%20eaq%20evaluation%20final%20report.pdf>

⁶ Brennan Center. The Dangers of Unregulated AI in Policing. November 2025. Available at: <https://www.brennancenter.org/our-work/research-reports/dangers-unregulated-ai-policing>