



OFFICE OF RACIAL EQUITY AND SOCIAL JUSTICE


Marc Elrich
County Executive

Tiffany Ward
Director and Chief Equity Officer

MEMORANDUM

January 8, 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) #25-29
FY25 Operating Budget-Department of Technology & Enterprise Business Solutions
Copilot 365 Pilot Program (\$308,000)

- I. **FINDING:** The Office of Racial Equity and Social Justice (ORESJ) finds that Supplemental Appropriation # 25-29 - *FY25 Operating Budget-Department of Technology & Enterprise Business Solutions Copilot 365 Pilot Program* has the potential to advance racial equity and social justice in Montgomery County. While it is possible that increased employee productivity and efficiency could help improve services and outcomes for residents, opportunities exist for the County to embed racial equity in the early stages of artificial intelligence planning.
- II. **BACKGROUND:** The purpose of SA #25-29 is to allow the County to pilot Microsoft Copilot 365,¹ with the purchase of 300 licenses and a trainer. The Department of Technology & Enterprise Business Solutions (TEBS) plans to include 300 users from diverse stakeholder groups in the pilot to help ensure comprehensive feedback and adoption. The trainer will engage 1:1 with employees, create training materials, hold lab sessions to answer questions, and establish an online training curriculum. The integration

¹ Microsoft 365 Copilot is an AI-powered productivity tool, providing real-time intelligence that enables users to complete tasks more efficiently, enhance their productivity & skills, and improve their overall work experience. Users get content relevant to their work tasks, like drafting, summarizing, and answering questions; all in the context of their work within their Microsoft 365 app. Available at: <https://learn.microsoft.com/en-us/copilot/microsoft-365/microsoft-365-copilot-overview>.

of advanced AI-driven tools like Microsoft Copilot 365 promises to enhance productivity, streamline workflows, and empower teams to achieve more. In addition to Microsoft Copilot 365, Grammarly is the other approved generative AI tool.

III. **ANALYSIS:** The County recently published an Artificial Intelligence Action Plan (Action Plan), which lays out the County's approach to using artificial intelligence (AI) to deliver new and enhanced services to County residents. The Artificial Intelligence Center for Excellence (AICOE), which was also established, will ensure the successful evaluation, implementation, and adoption of artificial intelligence solutions within the County's day-to-day business operations.²

TEBS provided the following in support of the Microsoft Copilot 365 pilot program's ability to reduce disparities and inequities in the County.

The use of Copilot 365 licenses, or any similar productivity and collaboration tools, can contribute to racial equity and social justice in several ways:

1. **Access to Opportunities:** *By providing licenses to tools like Copilot 365, organizations can ensure equitable access to essential software for all employees, regardless of their background. This helps in leveling the playing field and providing equal opportunities for productivity and career growth.*
2. **Collaboration and Inclusion:** *These tools facilitate seamless collaboration among diverse teams, enabling better communication and teamwork. Inclusive collaboration environments foster a sense of belonging and value among employees from different racial and social backgrounds.*
3. **Skill Development:** *Access to productivity tools encourages continuous skill development among employees. This is particularly beneficial for underrepresented groups who may face barriers to accessing training and resources. Improved skills can lead to enhanced career prospects and economic mobility.*
4. **Efficiency and Effectiveness:** *Utilizing such tools enhances organizational efficiency and effectiveness. This can lead to better outcomes across various business functions, potentially reducing biases and systemic barriers that hinder equitable opportunities.*
5. **Data and Insights:** *These tools often provide analytics and insights into usage patterns and productivity metrics. This data can be leveraged to identify and address disparities in access or utilization among different groups, thus supporting data-driven decisions towards equity.*
6. **Social Responsibility:** *TEBS prioritizes social responsibility and diversity initiatives. Providing equitable access to essential tools like Copilot 365 is a part of a broader commitment to promoting diversity, equity, and inclusion within the workplace.*

² Montgomery County Government Artificial Intelligence Action Plan. July 2024. Available at: <https://www.montgomerycountymd.gov/tebs/Resources/Files/ai-action-plan/MCG-AI-plan-web.pdf>

In summary, while the direct impact of Copilot 365 licenses on racial equity and social justice may seem indirect, their provision contributes to creating a more inclusive and equitable work environment by fostering collaboration, improving access to resources, and supporting professional development for all employees.

While the Action Plan discusses many of AI's benefits, it also includes some of its risks, which could include “data privacy, cybersecurity, accuracy, accountability, and ethical use.”³ The Action Plan also briefly notes how bias can be a byproduct of AI. The issue of bias, specifically racial bias, in artificial intelligence outputs and tools, was also discussed in REIA’s 24-54, 24-57, and 24-58 for Parking Security Camera Surveillance Systems in Bethesda, Wheaton, and Silver Spring. The REIA noted the following in relation to racial bias in AI.⁴

Several research studies, media stories, and documentaries such as Coded Bias, have repeatedly demonstrated that these AI-powered technologies are prone to accuracy problems, embedded bias, and misidentification issues along gender and racial lines. The Electronic Privacy Information Center (EPIC) defines algorithmic racism as occurring when the use of AI, machine learning, and other big data practices, generate outcomes that reproduces racial disparity and exacerbate inequities. They add that “even if not intentional, structural racism is embedded in the design and implementation of technology through under representative data sets, biased training data, implicit bias of coders and designers, and a lack of transparency and accountability.”

TEBS has provided plans and next steps for implementing the Action Plan, which include the following:⁵

- Establishing ongoing engagement and transparency with Montgomery County residents
- Evaluating and implementing general-purpose generative artificial intelligence tools for the enterprise workforce
- Updating governance processes to include an artificial intelligence review process
- Establishing an artificial intelligence discovery, education, and awareness plan
- Creating an AICOE project management plan
- Publishing lists of approved artificial intelligence vendors/products
- Establishing an artificial intelligence ethics review board
- Assessing and developing partnership opportunities with existing vendors
- Advertising and staffing TEBS artificial intelligence positions

³ IBID.

⁴ Available at: <https://www.montgomerycountymd.gov/ore/Resources/Files/24-54-24-57-24-58.pdf>

⁵ Montgomery County Government Artificial Intelligence Action Plan. July 2024. Available at: <https://www.montgomerycountymd.gov/tebs/Resources/Files/ai-action-plan/MCG-AI-plan-web.pdf>

- Developing an artificial intelligence intranet (internal) and internet (public facing) resource site
- Establishing secure configuration governance for artificial intelligence tools
- Actively monitoring and enforcing artificial intelligence policies
- Developing fiscal strategies for implementing and maintaining AI solutions

While plans to establish an artificial intelligence ethics review board are forthcoming, the scope and responsibilities of the board were unclear during this analysis. The Department's plan to include a diverse stakeholder group in the Copilot Pilot Program aligns with best practices in equitable AI implementation highlighted by Brookings's AI Equity Lab, which promotes inclusive, ethical, non-discriminatory, and democratized AI models and systems. The diversity of planning and oversight groups is essential, with the Lab noting, "who is at the table really matters in the beginning to ensure that AI does not commoditize Black people, and other marginalized groups, and that such ecosystems support the full consideration of the realities of the past histories and current lived experiences of certain groups."⁶ Given this, the ethics review board or AICOE could benefit from clearly defined responsibilities for addressing and mitigating algorithmic bias.

cc: Gail Roper, Chief Information Officer, Department of Technology & Business Enterprise Solutions
Tricia Swanson, Director, Strategic Partnerships, Office of the County Executive

⁶ Introducing the AI Equity Lab and the path toward more inclusive tech. Available at:

<https://www.brookings.edu/articles/introducing-the-ai-equity-lab-and-the-path-toward-more-inclusive-tech/>