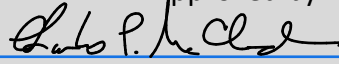


CITY OF CATHEDRAL CITY ADMINISTRATIVE POLICY			HR-AP -29	
TOPIC	ARTIFICIAL INTELLIGENCE (AI) – EQUIPPED CAMERAS FOR MUNICIPAL OPERATIONS			
Approved by:  <u>Charles McClendon (Jul 22, 2025 11:51 PDT)</u> Charles McClendon, City Manager		Distributed by Human Resources	Original Date July 22, 2025	Revised

## POLICY

This policy establishes guidelines for the use of artificial intelligence (AI)-equipped cameras for municipal operations, with initial implementation focused on code compliance activities. The City of Cathedral City is committed to improving community services through equitable, efficient, and educational methods while ensuring community safety, privacy, and data security. All City employees should be familiar with this policy as it may expand to other departmental operations as operational needs arise.

## PURPOSE

To implement an educational and technologically enhanced approach using AI detection tools for municipal operations. Current implementation focuses on code compliance activities to identify conditions requiring municipal attention as outlined in the Departmental Applications section below. This policy framework allows for expansion to other city departments as operational needs and technology capabilities develop.

This policy applies to all public areas and rights-of-way where there is no reasonable expectation of privacy.

## DEFINITIONS

- **AI-Equipped Camera:** A vehicle-mounted or stationary device that uses predictive artificial intelligence to scan public spaces and identify conditions requiring municipal attention via still images or video.
- **Municipal Condition:** Any observed condition requiring city department attention, including but not limited to non-compliance with Cathedral City Municipal Code, safety hazards, infrastructure deficiencies, or situations requiring municipal response.
- **Courtesy Notice:** A mailed notice outlining a violation, associated code or regulation, photo evidence, corrective steps, and a deadline for compliance prior to elevated enforcement actions.
- **Incident Report:** Documentation of conditions requiring immediate response or follow-up by appropriate city departments.
- **Blight Score:** A numeric indicator measuring the level of property neglect or deterioration.
- **Relative Blight Score:** A percentage metric comparing a property's condition to neighboring parcels.

- **Authorized Personnel:** City employees who have completed required training and are authorized to operate AI-equipped cameras or review flagged data within their department's scope of responsibility.
- **Sensitive Information:** Information that requires special handling due to privacy, security, or legal considerations, including but not limited to:
  - Personal identifying information of individuals captured in images
  - License plate numbers and vehicle identification data
  - Interior views of private property inadvertently captured
  - Information that could compromise ongoing investigations
  - Data that may be subject to attorney-client privilege
  - Medical or health-related information
  - Information involving minors
  - Any data specifically designated as confidential by law or regulation

## **CURRENT DEPARTMENTAL APPLICATIONS**

### **Code Enforcement Department (Current Implementation)**

**Primary Focus:** Municipal code compliance and blight prevention **AI Detection Applications:**

- Overgrown vegetation
- Abandoned or inoperable vehicles
- Graffiti and vandalism
- Illegal dumping
- Exterior blight conditions
- Business license and permit compliance
- Public health and safety code violations

### **Future Departmental Applications**

This policy framework is designed to accommodate expansion to other city departments as operational needs develop.

## **PROCEDURE**

### **1. AI Camera Operation and Deployment**

#### **Current Implementation:**

- Code Enforcement vehicles are equipped with AI-equipped cameras for designated public area scanning
- Images captured and flagged by AI systems are reviewed by trained Code Enforcement staff
- Future departmental implementations will follow similar protocols with department-specific training and authorization

## **Data Collection Standards:**

- All flagged items will be reviewed by trained personnel within the appropriate department
- Cross-departmental coordination will occur when conditions affect multiple department jurisdictions

## **2. Review and Response Protocol**

### **Initial Review:** Upon AI system flagging:

- Trained Code Enforcement staff will review flagged images/data within 24-48 hours
- Staff will confirm whether the condition requires departmental action
- Priority level will be assigned based on safety, legal, and operational considerations

### **Department Response:** Based on confirmation and priority:

- **Immediate Response:** Emergency or safety hazards requiring immediate attention
- **Routine Response:** Standard violations or conditions addressed through normal departmental procedures
- **Educational Response:** Minor violations addressed through courtesy notices and community education

## **3. Future Multi-Departmental Coordination**

### **Framework for Expansion:**

- When additional departments implement AI camera systems, shared jurisdiction issues will trigger coordinated response protocols
- Lead department will be designated based on primary jurisdiction and expertise
- Shared case management system will track multi-departmental responses when implemented

## **Data Sharing Standards:**

- Departments may share relevant data for coordinated responses
- All data sharing will comply with privacy policies and legal requirements
- Cross-departmental access will be logged and monitored

## **4. Notification and Communication**

### **Public Notification:**

- Courtesy notices will be issued for appropriate violations with educational information
- Emergency conditions will trigger immediate response without prior notice
- Community education materials will explain the program and its benefits

## **Record Keeping:**

- All actions taken based on AI-detected conditions will be documented in appropriate departmental systems
- Case tracking will include AI detection, human verification, and resolution outcomes
- Performance metrics will be maintained for program evaluation

## **DATA MANAGEMENT AND PRIVACY**

### **Data Security and Equipment Use Compliance**

All use of AI-equipped cameras and associated data must comply with Section 1210 of the City Personnel Rules regarding Use of City Equipment or Resources. This includes but is not limited to:

- **Official Use Only:** AI equipment and data shall be used solely for official City business
- **No Expectation of Privacy:** All AI system usage may be monitored and reviewed by the City
- **Proper Authorization:** Only authorized personnel may operate or access AI camera systems
- **Data Confidentiality:** Users must maintain confidentiality of sensitive information accessed through AI systems as defined in this policy

### **Technical Data Management**

All images and analytical data are securely stored by the City's contracted provider in accordance with contract specifications that require:

- Encrypted storage both at rest and in transit
- Access controls with multi-factor authentication
- Regular security audits and vulnerability assessments
- Compliance with applicable data protection standards
- Backup and disaster recovery procedures
- IT Department review and approval of all security protocols
- 
- Access is restricted to authorized personnel within relevant departments
- Data retention periods will comply with legal requirements and departmental needs

### **Privacy Protection**

- Use of AI systems and associated data shall be:
  - For official City use only, in accordance with Section 1210 of the Personnel Rules
  - In accordance with all applicable Personnel Rules and policies
  - Respectful of privacy rights and constitutional protections

- Limited to public areas with no reasonable expectation of privacy

### **Data Ownership and Use**

- Contractor retains ownership of images and analytical data as defined in service agreements
- City has limited rights to access and use data subject to acceptable use policies
- No data will be shared externally without proper authorization
- Improper use may result in corrective measures per Section 1210 of the Personnel Rules and applicable employee bargaining agreements

### **Public Records Act (PRA) Compliance**

#### **Data Ownership and PRA Scope:**

- City Detect retains ownership of raw data, analytical data, and AI output under contract terms
- City does not own or control data hosted on City Detect servers
- PRA requests apply only to City records created from City Detect output that has been incorporated into official City cases
- The City will not support PRA requests for AI camera data, reports, or AI output that has not been incorporated as part of an official City case

#### **Request Processing:**

- PRA requests for case-related records incorporating AI data will be processed through the City Clerk's office in coordination with the City Attorney
- Only City records (such as code compliance cases that incorporate AI output) are subject to PRA requirements
- Sensitive information must be redacted prior to release in accordance with applicable exemptions
- Response timelines will comply with California Public Records Act requirements

#### **Data Preparation for Release (City Records Only):**

- Personal identifying information will be redacted unless specifically required for the request
- License plate numbers and vehicle identification data will be redacted unless related to the specific violation or incident
- Interior views of private property will be redacted or excluded
- Information involving minors will be redacted unless authorized by court order

## **IMPLEMENTATION AND COMPLIANCE**

### **Training Requirements**

**Current Code Enforcement Training:** All authorized Code Enforcement personnel will complete comprehensive training covering:

- AI system capabilities and limitations
- Code enforcement applications and procedures
- Data privacy and security protocols
- Legal and ethical considerations
- Review of applicable Personnel Rules and bargaining agreements
- Sensitive information identification and handling procedures
- PRA compliance and data redaction requirements

**Future Departmental Training Framework:** When additional departments implement AI camera systems, training will be tailored to:

- Department-specific applications and procedures
- Inter-departmental coordination procedures
- Applicable regulations and legal requirements

### **Ongoing Training:**

- Annual refresher training for all authorized users
- Update training when systems or policies are modified
- Cross-departmental training sessions when multi-department coordination is implemented

### **Performance Evaluation**

- Code Enforcement performance metrics tracking and program evaluation
- Annual policy review and updates as needed
- Supervisor review of sensitive cases
- Community feedback integration
- Framework development for future departmental performance metrics

## **GOVERNANCE AND OVERSIGHT**

### **Policy Administration**

- City Manager's office serves as lead coordinator for policy implementation and future expansion
- Code Enforcement Department Head designates trained supervisors for current compliance oversight

- Department heads will designate supervisors when additional departments implement AI camera systems
- IT Department maintains oversight of vendor security compliance and contract requirements

#### **Review and Updates**

- Annual policy review and updates
- Community input during major policy changes
- Evaluation for potential expansion to additional city departments
- Annual review of vendor security protocols and contract compliance

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#### **NOTES**

This policy may be revised as needed to reflect evolving technology, operational needs, legal requirements, staffing availability, or City Council direction. All procedures will remain consistent with Cathedral City's core values of safety, community pride, inclusiveness, diversity, community investment, culture of service, and innovation beyond technology.

The current implementation focuses on code enforcement operations while establishing a framework for potential expansion to other city departments. All City employees should familiarize themselves with this policy as it establishes the foundation for responsible AI technology use within municipal operations.






# HR-AP-29 ARTIFICIAL INTELLIGENCE (AI) - EQUIPPED CAMERAS FOR MUNICIPAL OPERATIONS

Final Audit Report

2025-07-22

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