



**City of South St. Paul Police Department
Automated License Plate Reader (ALPR) Biennial Audit
Results Report
August 11, 2023**

At the request of the City of South St. Paul Police Department (SSPPD), LOGIS has conducted the biennial audit of their Automated License Plate Reader (ALPR) Systems pursuant to Minnesota Statute §13.824 Subd. 6.

Minnesota Statute §13.824 data elements include:

- Data Collection, Classification and Use Restrictions
- Destruction of Data
- Sharing Among Law Enforcement Agencies
- Log of Use Required
- Biennial Audit
- Authorization to Access Data
- Notification to the Bureau of Criminal Apprehension (BCA)

After analysis of the statutory requirements and evaluation of the City of South St. Paul Police Department's management and use of Automated License Plate Reader technology, LOGIS has found the City of South St. Paul Police Department in compliance with Minnesota Statute §13.824 based on the following findings:





| Control # | Statute Subd. | Control Objective | Testing Procedure | Testing Result |
|-----------|-----------------|---|---|---------------------|
| 1 | §13.824 Subd. 2 | Data collection; classification; use restrictions | <p>Reviewed SSPPD Automated License Plate Readers Policy 421 section on Data Collection and Retention.</p> <p>SSPPD provided screen prints of sample license plate reads from the BOSS ALPR system showing proper limited collection of data.</p> <p>SSPPD provided screen print of license plate data files being pulled only from state of Minnesota.</p> <p>SSPPD provided screen print of the BOSS ALPR system requiring the requester and case number be entered when searching the plate read database.</p> <p>Interviewed SSPPD staff and officers responsible for ALPR system administration.</p> | No exceptions found |

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| Control # | Statute Subd. | Control Objective | Testing Procedure | Testing Result |
|-----------|-----------------|--|---|---------------------|
| 2 | §13.824 Subd. 3 | Destruction of data required | Reviewed SSPPD Automated License Plate Readers Policy 421 section on Data Collection and Retention. SSPPD provided screen prints from the BOSS ALPR system showing retention settings set to 60 days. | No exceptions found |
| 3 | §13.824 Subd. 4 | Sharing among law enforcement agencies | Reviewed SSPPD Automated License Plate Readers Policy 421 section on Releasing ALPR Data. SSPPD provided screen print of BOSS ALPR system requiring the requester and case number be entered when searching the plate read database. Interviewed SSPPD staff and officers responsible for ALPR system administration. | No exceptions found |
| 4 | §13.824 Subd. 5 | Log of use required | SSPPD provided the most recent public logs of use. | No exceptions found |
| 5 | §13.824 Subd. 6 | Biennial audit | Reviewed SSPPD Automated License Plate Readers Policy 421 section on Accountability. Reviewed MN Legislative Reference Library for past audits. | No exceptions found |

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| 6 | §13.824 Subd. 7 | Authorization to access data | <p>Reviewed SSPPD Automated License Plate Readers Policy 421 section on Accountability.</p> <p>Reviewed SSPPD Protected Information Policy 803 section on Security Breaches.</p> <p>SSPPD provided screen print from BOSS ALPR system showing role-based access controls.</p> <p>Interviewed SSPPD staff and officers responsible for ALPR system administration.</p> | No exceptions found |
| 7 | §13.824 Subd. 8 | Notification to Bureau of Criminal Apprehension | <p>Reviewed SSPPD Automated License Plate Readers Policy 421 section on Operations – Restrictions, Notifications and Audits.</p> <p>Reviewed SSPPD License Plate Reader listing on Bureau of Criminal Apprehension website.</p> | No exceptions found |

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The findings in the Automated License Plate Reader Audit are impartial and based on information and documentation provided by the City of South St. Paul Police Department and examined by LOGIS information security staff and management. It demonstrates that the security, public accountability and administration of the SSPPD ALPR program is in compliance with MN Statute §13.824.

Local Government Information Systems (LOGIS) attested this audit on
August 11, 2023:

A handwritten signature in black ink that reads "Blake Tyra".

Blake Tyra
LOGIS
Information Security Specialist

Respectfully submitted to the following:

Brian Wicke, City of South St. Paul, Chief of Police
Minnesota Commissioner of Administration
Legislative Commission on Data Practices and Personal Data Privacy
Chairs of Legislative Committees

