

Minnesota Security Consortium – MNSec

Bringing Information Security to Local Minnesota Governments

Minnesota State Patrol 2023 ALPR Audit

Executive Summary

Prepared for the
Minnesota State Patrol
February 27, 2024



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Background:

Minnesota State Patrol retained the Minnesota Security Consortium to audit its agency's use of their ALPR program against the requirements of MN Statute 13.824. The Minnesota Security Consortium does not operate or have access to their ALPR systems, therefore allowing it to audit the systems as an independent auditor. The Minnesota State Patrol Command and IT Staff provided their administrative access to the PIPS Technology BOSS system during the audit to review audit criteria. This Audit Period will cover 1/1/2022 to 12/31/2023. Minnesota State Patrol had 6 active ALPR systems on Patrol Vehicles, at the time of the audit. No stationary ALPR units were reported at the time of the audit.

Department Policy & Procedures:

Minnesota State Patrol has an ALPR Policy in place entitled, "Policy Number 24-30-019: Automated License Plate Reader (ALPR)." They also have a Data Practices policy in place entitled, "Policy Number 23-10-025: Data Practices – Classification and Dissemination." They have been keeping their policies updated and it contains all the necessary policy statements related to ALPR data. A review of this policy found that Minnesota State Patrol was compliant in this part of the statute.

Record Retention:

The Minnesota State Patrol ALPR Boss administrative control panel was audited to ensure that each device setting was set for a retention period of no more than 60 days, pursuant to MN Statute 13.824, Subd. 3. All 6 devices had 2-day retention settings at the device level. No plate reads were detectable after 2 days. Minnesota State Patrol was found to be compliant with this part of the statute.

Data Security and Access Control:

The Minnesota State Patrol's ALPR system is protected by an Access Control system built into the BOSS backend server application. Users and groups were found to be current and appropriate for the intended use by the agency, allowing users only the minimum access that they need to perform their functions. User accounts and role-based accounts are reviewed on a regular basis by ALPR Administrators. The ALPR Administrator is appointed by the Minnesota State Patrol's Chief. The BOSS ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. Minnesota State Patrol was found to be compliant in this part of the statute.

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Data Classification:

Minnesota State Patrol ALPR Data that has been collected is classified as private non-public data unless access is permitted by law. Public data requests of data collected on a license plate owner's vehicle is readily available through a proper records request via the Minnesota State Patrol. Minnesota State Patrol was found to be compliant with this part of the statute.

Sharing Among Law Enforcement Agencies:

Appropriate sharing of ALPR data is conducted through inter-agency requests. The requests are made and reviewed though Agency Command. At the time of the Audit no inter-agency requests had been made. As a result of these findings, Minnesota State Patrol was found to be compliant with this part of the statute.

Public Log of Use:

The BOSS ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. The Minnesota State Patrol has been maintaining a standard set of Log of Use Reports, within the BOSS system. Sample reports from the past two months were reviewed during the audit process. Minnesota State Patrol was found to be compliant with this part of the statute.

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Notification to Bureau of Criminal Apprehension:

Minnesota State Patrol made the required notification to the Bureau of Criminal Apprehension when it started its ALPR Program. This was validated on the BCA website. The Minnesota State Patrol was found to be compliant with this part of the statute.

Biennial Public Accountability Audit:

Minnesota State Patrol expressed their intent to have their ALPR audits completed every two years. This audit period covered the dates 1/1/22 through 12/31/2023. Minnesota State Patrol had their last audit in 2022, which covered the period from 1/1/2020 to 12/31/21. Command and IT Staff were very cooperative throughout the entire audit process and understood the intent of the public accountability and provided easy access to policies and procedures, staff interviews, and audit of the Boss ALPR Systems. Minnesota State Patrol was found to be compliant with this part of the statute.

Breach Notification:

The Minnesota State Patrol utilizes General Order Number 23-20-019, "Minnesota Justice Information Services (MNJIS) and Security Incident Response," which includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. Minnesota State Patrol was found to be compliant with this part of the statute.

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Conclusion:

Based on the results of the Minnesota State Patrol ALPR Audit conducted by Minnesota Security Consortium, we can demonstrate that they are using the ALPR System as an effective law enforcement tool for the purpose of combating auto theft and other crimes linked to a vehicle license plates. The Minnesota State Patrol also demonstrated that the security, public accountability, and administration of the program in compliance with MN Statue 13.824.

This Audit was conducted and attested to by:



Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium

Submitted to:

Minnesota State Patrol

Minnesota Commissioner of Administration

Legislative Commission on Data Practices and Personal Data Privacy

Required Chairs of Legislative Committees

Minnesota Legislative Library