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Hennepin County Sheriff's Office

2023 ALPR Audit

Executive Summary

Prepared for the

Hennepin County Sheriff's Office

July 19, 2023

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Background:

Hennepin County Sheriff's Office 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 Hennepin County Sheriff's Office Command and IT Staff provided their administrative access to the Neology BOSS 4.0 ALPR system during the audit to review audit criteria. This Audit Period will cover 3/1/2022 to 5/31/2023. Hennepin County Sheriff's Office has active ALPR systems on 3 Patrol Vehicles. No stationary ALPR units were reported at the time of the audit.

Department Policy & Procedures:

Hennepin County Sheriff's Office has an ALPR Policy in place entitled, "Policy 460: Automated License Plate Readers (ALPR)." They have been keeping their policy updated and it contains all the necessary policy statements. A review of this policy found that Hennepin County Sheriff's Office was compliant in this part of the statute.

Record Retention:

The Hennepin County Sheriff's Office 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, per Statute. All devices were set for 30-day retention period, which is consistent with their policy. Hennepin County Sheriff's Office was found to be compliant with this part of the statute.

Data Security and Access Control:

The Hennepin County Sheriff's Office's ALPR system is protected by an Access Control system built into the BOSS cloud server application. Users, Groups and Roles 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 Hennepin County Sheriff. The BOSS ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. It showed audit logs for the access made during the audit. Hennepin County Sheriff's Office was found to be compliant in this part of the statute.

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Data Classification:

Hennepin County Sheriff's Office ALPR Data that has been collected is classified as private 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 Hennepin County Sheriff Office's "Data Request Form." Hennepin County Sheriff's Office 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, Hennepin County Sheriff's Office 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. Sample log of use report was reviewed during the audit process. Hennepin County Sheriff's Office was found to be compliant with this part of the statute.

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Notification to Bureau of Criminal Apprehension:

Hennepin County Sheriff's Office made the required notification to the Bureau of Criminal Apprehension when it started its ALPR Program. This was validated on the BCA website. The Hennepin County Sheriff's Office was found to be compliant with this part of the statute.

Biennial Public Accountability Audit:

Hennepin County Sheriff's Office plan on having their next audit in 2 years. 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. Hennepin County Sheriff's Office was found to be compliant with this part of the statute.

Breach Notification:

The Hennepin County Sheriff's Office provided a copy of their "Data Breach Policy." This is required by MN Statute 13.055 and MN Statute 13.824. Hennepin County Sheriff's Office was found to be compliant with this part of the statute.

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Conclusion:

Based on the results of the Hennepin County Sheriff's Office 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 Hennepin County Sheriff's Office also demonstrated that the security, public accountability, and administration of the program are compliant with MN Statute 13.824.

This Audit was conducted and attested to by:



Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium

Submitted to:

Hennepin County Sheriff's Office

Minnesota Commissioner of Administration

Legislative Commission on Data Practices and Personal Data Privacy

Required Chairs of Legislative Committees

Minnesota Legislative Library