



INDEPENDENT ACCOUNTANT'S REPORT
ON APPLYING AGREED-UPON PROCEDURES RELATING TO
AUTOMATED LICENSE PLATE READERS

The City of Bloomington
Bloomington, Minnesota

We have performed the procedures enumerated below, which were agreed to by the City of Bloomington, Minnesota and its management, solely to assist you with reporting on compliance with Minnesota Statute 13.824 regarding Automated License Plate Readers (ALPR's) for the period August 1, 2015 through July 31, 2017. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures performed and our results are presented in Attachment A.

We were not engaged to, and did not, conduct an audit, the objective of which would be the expression of an opinion, on the accounting records. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the above named individuals and is not intended to be, and should not be, used by anyone other than these specified parties.

Redpath and Company, LTD.
REDPATH AND COMPANY, LTD.
St. Paul, Minnesota

November 6, 2017

CITY OF BLOOMINGTON, MINNESOTA
ALPR AGREED-UPON PROCEDURES
Procedures and Results

ATTACHMENT A
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PROCEDURES	RESULTS
Access to ALPR Data	
a. Determine the City complied with MN Statute 13.824 subd 7, that requires written procedures to ensure that law enforcement personnel have access to data only if authorized in writing by the chief of police.	The chief of police has named the commander of investigations as his designee for all things ALPR related. Access to ALPR data is documented in the minutes of department meetings. We obtained department minutes showing documentation of the commander giving access to an officer. We obtained a copy of The City's Police Department Manual, Patrol Procedure 333, regarding ALPR. Among other things, Patrol Procedure 333 contains written procedures regarding access to ALPR data in compliance with MN Statute 13.824 subd 7.
b. Obtain log of all access to ALPR data for biennial period of 8/1/15 - 7/31/17	The software used by the City maintains a log of user access for a rolling period of only 30 days. On 8/16/17 we obtained a log of user access for the period 7/14/17 through 8/16/17. MN Statute 13.824 subd 7 requires a data audit trial, but does not state a specific time period. We recommend the City determine that a rolling 30 day period access log meets the requirement of Statutes.
c. Obtain a list of authorized users	We obtained a listing of users in the ALPR software. As of 8/14/17, there were 153 users set up in the ALPR software. There were five different access levels set up within the ALPR software. Each user is assigned access level based on their position within the department. The City has five police vehicles with ALPR cameras and these vehicles are rotated between police officers, therefore all police officers are given user names in the ALPR system.
d. Compare list of users on access log to list of authorized users	We obtained the access log (from 7/14/17 through 8/16/17). We selected 30% of the users (the AICPA suggest a sample size of 10% of small populations) that were present on the access log and compared it to a list of users from the BOSS software. We verified that all users in our sample were on the list of users from the BOSS software. We further tested the sample by tracing to payroll information in order to verify that the user was a police officer employed by the City, no exceptions were noted.
e. Determine that all users received training and were subject to background checks	<p>We obtained the City of Bloomington's employment rules stating that prior to becoming a police officer, all potential officer's receive a background check. Using the same sample from above, we verified with the HR department that all police officers in the sample underwent a background check. They were unable to obtain evidence of a background check for one police department employee. This employee is not a sworn police officer but is a civilian employee who is not subject to the same background check rules as a sworn police officer. Prior to this employee being hired, the individual was serving as an on-call firefighter for the City of Bloomington. The City staff believes he underwent a background check prior to becoming a firefighter.</p> <p>All police officers are trained on the ALPR system as part of their field training. We obtained the City's Field Training Manual for Phase I which had a task related to radio and mobile data computer used for ALPR familiarization training. Using the same sample from above, we verified with the HR department that all users passed their field tests and were properly trained in the ALPR software.</p>

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PROCEDURES	RESULTS
Retention of ALPR Data	
a. Obtain/view aging of ALPR data on or about August 15, 2017	<p>On September 14, 2017, we obtained a screenshot from a report that was ran for ALPR readings for the period of 8/1/15 - 8/1/17. No results were found. This verified that data was being purged within the 60 day requirement of MN Statute 13.824 subd. 3.</p> <p>We also observed/obtained screenshots showing the setting that the database information can be kept for up to 60 days. However, the City of Bloomington has chosen to purge the data after 30 days. Both of which are within the range of MN Statute 13.824 subd 3.</p>
Information Collected	
a. Select a sample of 93 readings (based on AICPA Sampling Guide Table A-1) for the previous 60 day period and determine that information collected/retained complies with MN Statute 13.824	<p>We obtained the oldest sequential identification number (for the ALPR readings) and estimated 1.1 million reads in the system (as there are about 30,000 - 40,000 reads per day). Using Excel's random number generator, we determined a random sample and tested to verify that the data matching the sequential identification number complied with MN Statute 13.824. There were five readings that had been automatically purged, based on the City's 30 day retention policy, by the time the police department ran the images of the ALPR readings. One picture taken by the camera was misread by the ALPR software, therefore the picture did not agree to the sample readings report. The remaining 87 ALPR readings all agreed to the report of the samples selected. The data retained was the following: the camera ID, the license plate number, the time of when the picture was taken, the location (latitude and longitude) a picture of the license plate, and a picture of the vehicle. All of which was allowable per MN Statute 13.824 subd 2.</p> <p>In addition, we observed the live capture of data, as the police department logged in with 3M's help (3M designed the software), to further verify that the only information being captured was within MN Statute 13.824. Data captured by the cameras was within the state statute. No exceptions noted.</p>
b. Walkthrough the hotlist process and verify that readings that show up as a "hit" are being matched against information provided by the MN Bureau of Criminal Apprehension.	We observed one hit on 8/15/17 and traced it back to the file of hotlist reads that the police department receives from the MN BCA twice per day. The license plate number reading from the ALPR system matched the file received from the MN BCA. Note that a hit is generated when a query from the hot list matches up against the reading from the ALPR software. This is the only way a read would come up as a "hit". No unlawful monitoring or tracking was evident based on the procedures performed.

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PROCEDURES	RESULTS
Sharing of ALPR Data Collected by City of Bloomington	
a. Obtain log of data sharing with other agencies	The police commander maintains a manual log of sharing of the ALPR data with other agencies. We were provided a copy of this log. The earliest entry in the log was 9/15/15, the latest entry in the log was 8/10/17.
b. Select sample and determine sharing of data is in compliance with MN Statute 13.824	Using AICPA guidance for small populations, we randomly selected 10% of the log to determine if the sharing of the data was in compliance with MN Statute 13.824 subd 4. Of our sample of 23 items, 12 were internal requests (which were supported by a case number), 10 were external requests that were all accompanied by a supporting email which documented a case number from the requesting agency, and one item was supported by a phone call. No instances of noncompliance noted.

Public Log of Information

a. Determine if the City complied with MN Statute 13.824 Subd. 5	Based on our observation of the software and collection of data needed to complete this AUP, the City is maintaining the information contained in MN Statute 13.824 subd 5. As previously noted, the information is maintained for 30 days.
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Other

a. Obtain detail listing of ALPR units purchased	We obtained supporting documentation for all ALPR units that have been purchased by the City of Bloomington. The City maintains 16 stationary units in service, eight stationary units not in service in the police station (which we observed), and five mobile units that are in service, in police vehicles.
b. Determine City of Bloomington maintains a list of stationary ALPR units in compliance with MN Statute 13.824	We obtained the LPR Agency Collection Form the City sent to the MN BCA showing the location of their stationary ALPR units. The information on the form agreed with the information maintained in the City software.