



South St. Paul Police Department 2019 ALPR Audit

Executive Summary

August 15, 2019

Background:

South St. Paul Police Department retained the LOGIS Security Specialist in order to audit the Agency's use of ALPRs against the requirements of MN Statute 13.824. The LOGIS Security Specialist does not have any direct or indirect access to the BOSS/PAGIS ALPR systems, therefore allowing it to audit the systems as an independent auditor. City of South St. Paul IT Staff provided their administrative access to the BOSS/PAGIS in order to review audit criteria. South St. Paul Police Department installed and began using their ALPR system in 2012. South St. Paul Police Department signed an Audit Agreement on May 20, 2019. South St. Paul Police Department has ALPR systems on 6 Squad Cars and no stationary ALPR units at the time of the audit.

Department Policy & Procedures:

South St. Paul Police Department has an ALPR Policy in place entitled Policy #420 and Policy #802: Automated License Plate Readers (ALPR). They have been keeping it updated to reflect the most current version of MN Statute 13.824. A review of this policy found that South St. Paul Police Department was compliant in this part of the statute.





Data Security and Access Control:

The South St. Paul Police Department ALPR system is protected by Access Control users and groups that protect access to the ALPR Data on a permitted basis only. User accounts and role based accounts are reviewed on a regular basis by ALPR Administrators. The ALPR Administrator is appointed by the South St. Paul Chief of Police. Police Officers and other department members that are selected by command to operate the ALPR in squad cars or to have ALPR data access are required to complete training, read through and acknowledge they understand the ALPR Policy and are then granted access to the system as an ALPR Operator. The BOSS ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. South St. Paul was found to be compliant in this part of the statute.

Record Retention:

The South St. Paul Police Department 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. South St. Paul was found to be compliant with this part of the statute.

Data Classification:

South St. Paul Police Department 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 South St. Paul Police Department. Citizens can fill out the agency's Request for Police Data Form. South St. Paul 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 to the Operations Commander or other personnel as authorized by the Chief of Police. The requests are documented by agency name, requesting party and case number and documented into the BOSS search to create an audit trail. As a result of these findings, South St. Paul was found to be compliant with this part of the statute.





Public Log of Use:

South St. Paul Police Department compiles monthly reports that contain the requirements of 13.824 Subd. 5. The ALPR Administrator demonstrated how they created these reports, and ensured that license plate numbers are not being stored in these reports. These public logs of use are readily available through a proper records request through the South St. Paul Police Department. South St. Paul was found to be compliant with this part of the statute.

Notification to Bureau of Criminal Apprehension:

South St. Paul Police Department has made the required notification to the Bureau of Criminal Apprehension. This was validated on the BCA website. South St. Paul was found to be compliant with this part of the statute.

Biennial Public Accountability Audit:

South St. Paul Police Department installed their ALPR system in 2012. They had their first ALPR Audit in June 2017 and signed an ALPR audit agreement on May 20, 2019 for their biennial audit renewal. Command understood the intent of the public accountability and provided easy access to policies and procedures, staff interviews, and audit of the Boss ALPR Systems. The Chief of Police acknowledges their intent to comply with MN Statute 13.824 and to continue audits every two years. South St. Paul was found to be compliant with this part of the statute.

Breach Notification:

The South St. Paul Police Department utilizes the City's Incident Response Policy which includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. South St. Paul was found to be compliant with these part of the statutes.





Conclusion:

Based on the results of the South St. Paul Police Department ALPR Audit conducted by LOGIS, we are able to 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. It also demonstrates that the security, public accountability and administration of the program is in compliance with MN Statute 13.824.

This Audit was conducted and attested to by:

A handwritten signature in blue ink, appearing to read "Dimitrios Hilton".

Dimitrios Hilton

LOGIS Security Specialist

Submitted to: South St. Paul Chief of Police
 Minnesota Commissioner of Administration
 Legislative Commission on Data Practices and Personal Data Privacy
 Chairs of Legislative Committees

