



Crystal Police Department 2019 ALPR Audit

Executive Summary

September 16, 2019

Background:

Crystal 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 Crystal Police Department Staff provided their administrative access to the BOSS/PAGIS in order to review audit criteria. Crystal Police Department installed and began using their ALPR system in 2014. Crystal Police Department signed an Audit Agreement on June 25, 2019. Crystal Police Department has ALPR systems on one Squad Car and no stationary ALPR units at the time of the audit.

Department Policy & Procedures:

Crystal Police Department has an ALPR Policy in place and has been keeping it updated to reflect the most current version of MN Statute 13.824. A review of this policy found that Crystal Police Department was compliant in this part of the statute.



Data Security and Access Control:

The Crystal 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 Crystal 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. Crystal Police Department was found to be compliant in this part of the statute.

Record Retention:

The Crystal Police Department ALPR backend BOSS system was audited to ensure that each device setting was set for a retention period of no more than 60 days. Crystal Police Department was found to be compliant in this part of the statute.

Data Classification:

Crystal Police Department ALPR Data that has been collected is classified as private unless access is permitted by law. The ALPR system is on premise and the collected data is not stored in a state depository. Public data requests of data collected on a license plate owner's vehicle is readily available through a proper records request via the Crystal PD Records. Crystal Police Department was found to be compliant in this part of the statute.

Sharing Among Law Enforcement Agencies:

Appropriate sharing of ALPR data is conducted through inter-agency requests. These requests are logged and reviewed by an Agency Supervisor. The requests are documented in their ALPR Records Request form which includes the name of requesting officer, case number and reason for the request. Crystal Police Department was found to be compliant in this part of the statute.

Public Log of Use:

Crystal 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 Crystal PD. Crystal Police Department was found to be compliant in this part of the statute.

Notification to Bureau of Criminal Apprehension:

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

Biennial Public Accountability Audit:

Crystal Police Department signed an ALPR audit agreement on June 25, 2019. Command understood the intent of the public accountability and provided easy access to policies and procedures, staff interviews, and audit of the ALPR Systems. The Chief of Police acknowledges their intent to comply with MN Statute 13.824 and to continue audits every two years. Crystal Police Department was found to be compliant in this part of the statute.

Breach Notification:

The Crystal 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. Crystal was found to be compliant with these part of the statutes.



Conclusion:

Based on the results of the Crystal 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 Statue 13.824.

This Audit was conducted and attested to by:



Dimitrios Hilton

LOGIS Security Specialist

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

