

Chris Steller

From: Dimitrios Hilton <dhilton@infosecassociates.us>
Sent: Friday, December 27, 2019 2:09 PM
To: stacie christensen
Cc: Lee vague; Dimitrios Hilton; sally olson; Rep.Mike Freiberg; rep nick zerwas; Rep.Carlos Mariani; Rep.Brian Johnson; sen warren limmer; Chris Steller
Subject: Woodbury Public Safety 2019 ALPR Audit Executive Summary Report
Attachments: Woodbury Public Safety 2019 ALPR Audit Executive Summary.PDF

Stacie Christensen | Director
Data Practices Office
Assistant Director | Community Services Division
50 Sherburne Avenue, Suite 201
Saint Paul, MN 55155
stacie.christensen@state.mn.us

On behalf of the Lee Vague, Public Safety Director/Chief of Police of the Woodbury Public Safety Department, I am submitting to you their 2019 ALPR Audit Executive Summary Report which I completed in December of 2019.

I have copied all of the required additional committees as required by Statute.

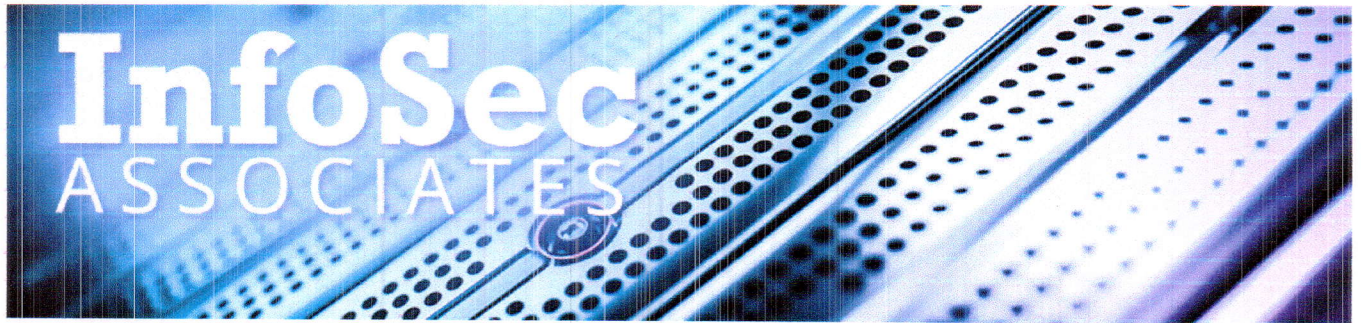
If you have any further question, please don't hesitate to email or call.

Sincerely,

Dimitrios Hilton

CC: Sen. Ron Katz via US Mail

Dimitrios Hilton
President & Chief Information Security Officer InfoSec Associates Ltd.
IDS Center 80 South Eight Street, Suite 900 Minneapolis, MN 55402
(Tel) 651-760-8365
dhilton@InfoSecAssociates.us
www.InfoSecAssociates.us

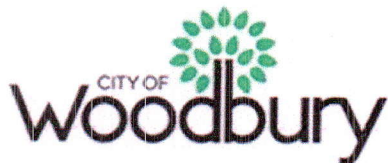


Woodbury Public Safety Department 2019 ALPR Audit

Executive Summary

Prepared for City of Woodbury

December 26, 2019



**Background:**

Woodbury Public Safety Department retained InfoSec Associates LTD. in order to audit its agency's use of ALPR's against the requirements of MN Statute 13.824. InfoSec Associates does not operate or have access to their ALPR systems, therefore allowing it to audit the systems as an independent auditor. The City of Woodbury Public Safety Department IT Staff provided their administrative access to the BOSS/PAGIS during the audit in order to review audit criteria. Woodbury Public Safety Department had their last ALPR Audit in 2017, as required by Statute. Woodbury Public Safety Department has ALPR systems on 2 Squad Cars and no stationary ALPR units at the time of the audit.

Department Policy & Procedures:

Woodbury Public Safety Department has an ALPR Policy in place entitled, "Admin Order No PP-431: Automated License Plate Readers (ALPRs)." A review of this policy found that Woodbury Public Safety Department was compliant in this part of the statute.

Record Retention:

The Woodbury Public Safety 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. In addition, sample read data was searched for during dates beyond 60 days. No reads beyond 60 days were returned on the searches, indicating that the 60 day retention period was destroying old plate read data properly. Woodbury Public Safety Department was found to be compliant with this part of the statute.

Data Security and Access Control:

The Woodbury Public Safety Department'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. Members of the Woodbury Public Safety Department must undergo in-service training prior to being permitted to use the ALPR System. User accounts and role based accounts are reviewed on a regular basis by ALPR Administrators. The ALPR Administrator is appointed by the Woodbury Public Safety Director/Police Chief. The BOSS ALPR system also contains a robust audit trail which was sampled to determine if the system is logging access by users properly. The Woodbury Public Safety Department was found to be compliant in this part of the statute.

**Data Classification:**

Woodbury Public Safety 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 Woodbury Public Safety Department. Citizens can fill out the agency's Woodbury MN Public Info Center form or by filling out a similar form at the Public Safety Front Desk. Woodbury Public Safety Department 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. Agencies can also fill out the online Woodbury MN Public Info Center form or by filling out a similar form at the Public Safety Front Desk or other personnel as authorized by the Public Safety Director/Police Chief. The requests are documented by agency name, requesting party and case number. As a result of these findings, Woodbury Public Safety Department 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. Woodbury Public Safety Department compiles monthly reports that contain the requirements of 13.824 Subd. 5. Sample reports from the past two months were reviewed during the audit process. These public logs of use are readily available through a proper records request through the Woodbury Public Safety Department. Woodbury Public Safety Department was found to be compliant with this part of the statute.

Notification to Bureau of Criminal Apprehension:

Woodbury Public Safety Department has made the required notification to the Bureau of Criminal Apprehension. This was validated on the BCA website. Woodbury Public Safety Department was found to be compliant with this part of the statute.

**Biennial Public Accountability Audit:**

Woodbury Public Safety Department installed their ALPR system in 2015. They had their first ALPR Audit in September 2017, and continue to plan for an independent audit every two years, per MN Statute 13.824. Command and IT Staff were very cooperative throughout the entire audit process and understand the intent of the public accountability and provided easy access to policies and procedures, staff interviews, and audit of the Boss ALPR Systems. Woodbury Public Safety Department was found to be compliant with this part of the statute.

Breach Notification:

The Woodbury Public Safety 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. Woodbury Public Safety Department was found to be compliant with this part of the statute

Conclusion:

Based on the results of the Woodbury Public Safety Department ALPR Audit conducted by InfoSec Associates, LTD., 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. The Woodbury Public Safety Department also demonstrated 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:

A handwritten signature in blue ink, appearing to read 'D. Hilton', is written over a horizontal line.

Dimitrios Hilton

Senior Auditor, InfoSec Associates, LTD.

Submitted to:

- Woodbury Public Safety Director/Police Chief
- Minnesota Commissioner of Administration
- Legislative Commission on Data Practices and Personal Data Privacy
- Required Chairs of Legislative Committees
- Minnesota Legislative Library