



Inver Grove Heights Police Department 2019 ALPR Audit

Executive Summary

Prepared for City of Inver Grove Heights

December 30, 2019





Background:

Inver Grove Heights Police 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 Inver Grove Heights Police Department Command Staff provided their administrative access to the BOSS/PAGIS during the audit in order to review audit criteria. Inver Grove Heights Police Department had their last ALPR Audit in 2017, as required by Statute. Inver Grove Heights Police Department currently has 2 ALPR systems on squad cars and with no stationary ALPR units at the time of the audit.

Department Policy & Procedures:

Inver Grove Heights Police Department has an ALPR Policy in place entitled, "Policy Number 17-25: Automated License Plate Reader (ALPR)." They have been reviewing and keeping their policy updated on a regular basis. A review of their policy found that Inver Grove Heights Police Department was compliant in this part of the statute.

Record Retention:

The Inver Grove Heights 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. During the audit, sample read data was searched for with dates approximately 75 days old, and no plate data was returned, indicating that the ALPR reads data had purged in accordance to the retention period. Inver Grove Heights Police Department was found to be compliant with this part of the statute.

Data Security and Access Control:

The Inver Grove Heights Police 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. User accounts and role based accounts are reviewed on a regular basis by ALPR Administrators. The ALPR Administrator is appointed by the Inver Grove Heights Police Department's Chief of Police. The BOSS ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. Inver Grove Heights Police Department was found to be compliant in this part of the statute.



Data Classification:

Inver Grove Heights 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 Inver Grove Heights Police Department. Citizens can fill out the agency's Request for Police Data form if they would like to request ALPR data that they are entitled to by statute. Inver Grove Heights Police 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. The requests are made to the Inver Grove Heights Police Department and approved by the ALPR Administrator or his/her designee, as authorized by the Chief of Police. The requests are documented by agency name, requesting party, reason and case number. As a result of these findings, Inver Grove Heights Police 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. Inver Grove Heights Police 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 Inver Grove Heights Police Department. Inver Grove Heights Police Department was found to be compliant with this part of the statute.

Notification to Bureau of Criminal Apprehension:

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

Biennial Public Accountability Audit:

Inver Grove Heights Police Department installed their ALPR system in 2012. They had their first ALPR Audit in 2017, as required by statute, and have indicated their intent to have an independent audit every two years, MN Statute 13.824, Subd. 6. Command 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. Inver Grove Heights Police Department was found to be compliant with this part of the statute.



Conclusion:

Based on the results of the Inver Grove Heights Police 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 Inver Grove Heights Police Department also demonstrated 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 dark ink, appearing to read 'Dimitrios Hilton', is written over a solid horizontal line.

Dimitrios Hilton

Senior Auditor, InfoSec Associates, LTD.

Submitted to:

Inver Grove Heights Police Department Chief of Police

Minnesota Commissioner of Administration

Legislative Commission on Data Practices and Personal Data Privacy

Required Chairs of Legislative Committees

Minnesota Legislative Library