



Office of City Clerk
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February 21, 2020

Alice Roberts-Davis, Commissioner
Minnesota Department of Administration
200 Administration Building
50 Sherburne Ave
St. Paul, MN 55155

Minnesota House of Representatives
Representative John Lesch, Chair
Committee on Judiciary Finance and Civil Law Division
563 State Office Building
100 Rev. Dr. Martin Luther King, Jr. Blvd
St. Paul, MN 55155

Representative Peggy Scott, Republican Lead
Committee on Judiciary Finance and Civil Law Division
335 State Office Building
100 Rev. Dr. Martin Luther King, Jr. Blvd
St. Paul, MN 55155

Minnesota House of Representatives
Representative Carlos Mariani, Chair
Committee on Public Safety and Criminal Justice Reform Finance and Policy Division
381 State Office Building
100 Rev. Dr. Martin Luther King, Jr. Blvd
St. Paul, MN 55155

Representative Brian Johnson, Republican Lead
Committee on Public Safety and Criminal Justice Reform Finance and Policy Division
243 State Office Building
100 Rev. Dr. Martin Luther King, Jr. Blvd
St. Paul, MN 55155

Minnesota Senate
Senator Warren Limmer, Chair
Judiciary and Public Safety Finance and Policy Committee
3221 Minnesota Senate Building
95 University Ave W
St. Paul, MN 55155

Senator Ron Latz, Ranking Minority Member
Judiciary and Public Safety Finance and Policy Committee
2215 Minnesota Senate Building
95 University Ave W
St. Paul, MN 55155

Sally Olson, Commission Administrator
Legislative Coordinating Commission Subcommittee on Data Practices
72 State Office Building
100 Rev. Dr. Martin Luther King, Jr. Blvd
St. Paul, MN 55155

Enclosed please find the Independent Biennial Audit of the Minneapolis Police Department Automated License Plate Reader (ALPR) system Audit Summary Report, for the period August 1, 2017 to July 31, 2019, and completed on February 3, 2020.

Sincerely,


Irene Kasper,
City Clerk's Office

Cc: Legislative Reference Library, refdesk@lrl.leg.mn
Ryan Patrick, Interim Director of Minneapolis Internal Audit

Enclosures: Summary Report and Certificate of Audit Summary Report by Governing Body

CERTIFICATE OF AUDIT SUMMARY REPORT
BY GOVERNING BODY

(Pursuant to Minnesota Statute 13.824, subd. 6)

STATE OF MINNESOTA


County of Hennepin

TO THE COMMISSIONER OF ADMINISTRATION; CHAIR AND RANKING MINORITY MEMBERS OF THE COMMITTEES OF THE HOUSE OF REPRESENTATIVES AND THE SENATE WITH JURISDICTION OVER DATA PRACTICES AND PUBLIC SAFETY ISSUES; AND THE LEGISLATIVE COORDINATING COMMISSION SUBCOMMITTEE ON DATA PRACTICES (FORMERLY LEGISLATIVE COMMISSION ON DATA PRACTICES AND PERSONAL DATA PRIVACY):

PLEASE TAKE NOTICE, That the undersigned chief clerical officer of the City of Minneapolis DOES HEREBY CERTIFY, that in compliance with the provisions of Minnesota Statute 13.824, automated license plate readers, Wildcard Corporation conducted an audit of the Minneapolis Police Department's Automated License Plate Reader (ALPR) system to ensure compliance with state laws in accordance with Minnesota Statute 13.824, and was presented to the City Audit Committee on January 13, and February 3, 2020, and published on February 3, 2020. The scope of the audit covers August 1, 2017 to July 31, 2019.

A copy of the Independent Biennial Audit of the Minneapolis Police Department ALPR system Audit Summary Report is hereby annexed and made a part of this certificate by reference.



Signed 
Casey Joe Carl, City Clerk
City of Minneapolis
(Official designation of officer)

Chief Arradondo:

Wildcard has completed an audit of the Automated License Plate Reader (ALPR) system managed and used by the Minneapolis Police Department (MPD) in fulfillment of the statutory audit requirements established by MN State Statute 13.824 Subd. 6. After analysis of the relevant statutory requirements and evaluation of MPD's management and use of ALPR technology and data for the audit review period, Wildcard has concluded this engagement. **Wildcard found MPD to be in compliance.** We evaluated the following:

1. MPD policy and procedures provide the appropriate classification of ALPR data as defined by statute.
2. MPD policy and procedures limited the use of ALPR data by:
 - a. Matching data only in Minnesota license plate database
 - b. ALPR data not used to monitor or track an individual who is the subject of an active criminal investigation inappropriately.
 - c. MPD has put in place processes to validate that ALPR data is maintained and destroyed as mandated by statute
 - d. ALPR unrelated to a criminal investigation is destroyed after 60 days from the time of collection.
 - e. ALPR data related to criminal investigations are preserved in line with retention requirements mandated by related Minnesota Statutes.
3. MPD has in place processes to share data only with authorized agencies.
4. MPD is able to produce a log of ALPR use showing that data captured:
 - a. Is limited to authorized data
 - b. the aggregate number of vehicles or license plates on which data are collected for each period of active use
 - c. the number of vehicles or license where the data identify a vehicle or a license plate that has been stolen, a warrant for the arrest of the owner of the vehicle or an owner with a suspended or revoked driver's license or similar category
 - d. current and previous locations of fixed ALPR cameras
5. Access to ALPR data is restricted to trained and authorized staff per MPD's ALPR policy. Access queries are logged in an audit trail.
6. MPD has in place processes to appropriately notify the Bureau of Criminal Apprehension in the event of an expansion of ALPR capabilities.

Wildcard has determined that MPD conforms to MN State Statute 13.824 in its operation and management of its ALPR system. MPD has demonstrated a good faith effort to dutifully comply with the requirements and limits imposed by the legislature in the use of ALPR technology and data and found no evidence of misuse.

Sincerely,
Timothy McLaurin, Director of Information Security