



Bloomington Police Department Automated License Plate Reader (ALPR) Audit Executive Summary

September 7, 2021

Background:

The Bloomington Police Department retained LOGIS to audit the Agency's use of ALPRs against the requirements of MN Statute 13.824. The LOGIS Security Analyst does not have any direct or indirect access to the Bloomington Police Department's BOSS ALPR System, therefore allowing them to audit the system as an independent auditor. The Bloomington Police Department provided reports and screenshots of the BOSS ALPR System in order to review audit criteria. The Bloomington Police Department installed and began using their ALPR mobile devices in 2009 and stationary devices in 2012. At the time of this audit, Bloomington Police Department has ALPR systems on 6 squad cars, and 27 stationary ALPR units.

Department Policy and Procedures:

Bloomington 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 Bloomington Police Department was compliant in this part of the Statute.

Data Security and Access Control:

The Bloomington Police Department ALPR system contains users and groups that protect access to the ALPR data on a permitted basis only. User accounts are reviewed on a regular basis by the ALPR Administrator. The ALPR Administrator is appointed by the Bloomington Chief of Police. Police Officers and other department members that are selected by the Chief of Police to be an ALPR operator are required to complete training, read through and acknowledge they understand the ALPR Policy. The BOSS ALPR System contains a robust audit trail which was sampled to determine if it is logging access by users properly. Bloomington Police Department was found to be compliant in this part of the Statute.

Record Retention:

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



Data Classification:

Bloomington Police Department ALPR data that has been collected is classified as private unless access is permitted by law. Citizens can contact the Bloomington Police Department Data Release Coordinator to obtain ALPR data on their registered vehicles. This request is reviewed by the Data Release Coordinator and Civilian Services Manager, to ensure that it is consistent with the ALPR Statute 13.824 and Minnesota Data Practices Act, Minnesota Statutes, Chapter 13. The request is then fulfilled by the Investigations Commander who has access to the BOSS ALPR System. Bloomington 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 Investigations Commander as authorized by the Chief of Police. The requests are documented by agency name, requesting party, case number, reason and license plate number. As a result of these findings, Bloomington Police Department was found to be compliant with this part of the Statute.

Public Log of Use:

Bloomington 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 Bloomington Police Department. Bloomington Police Department was found to be compliant with this part of the Statute.

Notification to Bureau of Criminal Apprehension:

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

Biennial Public Accountability Audit:

Bloomington Police Department signed an ALPR audit agreement with LOGIS on August 31, 2021. Police Command understands the intent of the public accountability and to provide easy access to policies and procedures, staff interviews, and audit of the BOSS ALPR System. The Chief of Police acknowledges their intent to comply with MN Statute 13.824 and to continue audits every two years. The Bloomington Police Department was found to be compliant with this part of the Statute.



Breach Notification:

The Bloomington Police Department Manual Patrol Procedure 333 includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. The Bloomington Police Department was found to be compliant with these parts of the Statutes.

Conclusion:

Based on the results of the Bloomington 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 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:



Blake Tyra
LOGIS Information Security Analyst

Submitted to: Michael Hartley, City of Bloomington, Chief of Police
Minnesota Commissioner of Administration
Legislative Commission on Data Practices and Personal Data Privacy
Chairs of Legislative Committees

