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City of St. Paul Police Department Automated License Plate Reader (ALPR) Biennial Audit Results Report December 22, 2021

At the request of the City of St. Paul Police Department (SPPD), LOGIS has conducted the biennial audit of their Automated License Plate Reader (ALPR) System pursuant to Minnesota Statute §13.824 Subd. 6.

Minnesota Statute §13.824 data elements include:

- Data Collection, Classification and Use Restrictions
- Destruction of Data
- Sharing Among Law Enforcement Agencies

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- Log of Use Required
- Biennial Audit

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- Authorization to Access Data
- Notification to the Bureau of Criminal Apprehension (BCA)

After analysis of the statutory requirements and evaluation of the City of St. Paul Police Department's management and use of Automated License Plate Reader technology, LOGIS has found the City of St. Paul Police Department in compliance with Minnesota Statute §13.824 based on the following findings:



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Control #	Statute Subd.	Control Objective	Testing Procedure	Testing Result
1	§13.824 Subd.	Data collection;	Reviewed SPPD License Plate Reader	No exceptions found
	2	classification; use	Policy 445.17 section on data collection,	
		restrictions	classification & use restrictions.	
			SPPD provided screen print of sample	
			license plate read showing proper limited collection of data.	
			SPPD provided screen print of license	
			plate data file being pulled only from state	
			of Minnesota weekly.	
			SPPD provided screen print of LEONARDO	
			ALPR system requiring Reason for Action	
			when looking up plate reads. Reasons for	
			Action must include case number, type of	
			case, description and reason.	
			Interviewed SPPD staff and officers	
			responsible for ALPR system	
			administration.	

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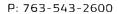
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Control #	Statute Subd.	Control Objective	Testing Procedure	Testing Result
2	§13.824 Subd. 3	Destruction of data required	Reviewed SPPD License Plate Reader Policy 445.17 section on destruction of data. SPPD provided screen print from LEONARDO ALPR System showing	No exceptions found
			retention settings set to 60 days.	
3	§13.824 Subd. 4	Sharing among law enforcement agencies	Reviewed SPPD License Plate Reader Policy 445.17 section on sharing among law enforcement agencies.	No exceptions found
			SPPD provided screen print of LEONARDO ALPR system requiring	
			Reason for Action when looking up	
			plate reads. Reasons for Action must	
			include case number, type of case, description and reason.	
			Interviewed SPPD staff and officers responsible for ALPR system administration.	
4	§13.824 Subd. 5	Log of use required	Reviewed SPPD License Plate Reader Policy 445.17 section on authorization to access data.	No exceptions found
			SPPD provided the most recent public log of use.	
5	§13.824 Subd. 6	Biennial audit	Reviewed SPPD License Plate Reader Policy 445.17 section on biennial audit.	No exceptions found
			Reviewed MN Legislative Reference Library for past audits.	



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Control #	Statute Subd.	Control Objective	Testing Procedure	Testing Result
6	§13.824 Subd. 7	Authorization to access data	Reviewed SPPD License Plate Reader Policy 445.17 sections on authorization to access data and destruction of data.	No exceptions found
			SPPD provided screen print from LEONARDO ALPR System showing retention settings set to 60 days.	
			Interviewed SPPD staff and officers responsible for ALPR system administration.	



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Control #	Statute Subd.	Control Objective	Testing Procedure	Testing Result
7	§13.824 Subd. 8	Notification to	Reviewed SPPD License Plate Reader	No exceptions found
		Bureau of Criminal	Policy 445.17 section on Notification to	
		Apprehension	Bureau of Criminal Apprehension.	
			Reviewed SPPD License Plate Reader	
			listing on Bureau of Criminal	
			Apprehension website.	

The findings in the Automated License Plate Reader Audit are impartial and based on information and documentation provided by the City of St. Paul Police Department and examined by LOGIS information security staff and management. It demonstrates that the security, public accountability and administration of the SPPD ALPR program is in compliance with MN Statute §13.824.

Local Government Information Systems (LOGIS) attested this audit on December 22, 2021:

Blake Tyra LOGIS Information Security Analyst

Respectfully submitted to the following:

Robert Thomasser, City of St. Paul, Assistant Chief of Police Minnesota Commissioner of Administration Legislative Commission on Data Practices and Personal Data Privacy Chairs of Legislative Committees



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