



South St. Paul Police Department Automated License Plate Reader (ALPR) Audit Executive Summary

August 12, 2021

Background:

The South St. Paul 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 South St. Paul Police Department's BOSS ALPR System, therefore allowing them to audit the system as an independent auditor. The South St. Paul Police Department provided reports and screenshots of the BOSS ALPR System in order to review audit criteria. The South St. Paul Police Department installed and began using their ALPR system in 2013. At the time of this audit, South St. Paul Police Department has ALPR systems on 10 squad cars, and no stationary ALPR units.

Department Policy and Procedures:

South St. Paul 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 South St. Paul Police Department was compliant in this part of the Statute.

Data Security and Access Control:

The South St. Paul 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 South St. Paul 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. South St. Paul Police Department was found to be compliant in this part of the Statute.

Record Retention:

The South St. Paul 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. South St. Paul Police Department was found to be compliant in this part of the Statute.



Data Classification:

South St. Paul Police Department ALPR data that has been collected is classified as private unless access is permitted by law. Citizens can contact the South St. Paul Police Department Office Manager to obtain ALPR data on their registered vehicles. This request is reviewed by the Operations Commander, 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 Operations Commander who has access to the BOSS ALPR System. South St. Paul 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 Operations 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, South St. Paul Police Department was found to be compliant with this part of the Statute.

Public Log of Use:

South St. Paul 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 South St. Paul Police Department. South St. Paul Police Department was found to be compliant with this part of the Statute.

Notification to Bureau of Criminal Apprehension:

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

Biennial Public Accountability Audit:

South St. Paul Police Department signed an ALPR audit agreement with LOGIS on June 24, 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 South St. Paul Police Department was found to be compliant with this part of the Statute.





Breach Notification:

The South St. Paul Police Department utilizes the City of South St. Paul Police Department Protected Information Policy (Policy 803) which includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. The South St. Paul Police Department was found to be compliant with these parts of the Statutes.

Conclusion:

Based on the results of the South St. Paul 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 Statue 13.824.

This Audit was conducted and attested to by:

A handwritten signature in black ink that reads "Blake Tyra".

Blake Tyra
LOGIS Information Security Analyst

Submitted to: William Messerich, City of South St. Paul, Chief of Police
Minnesota Commissioner of Administration
Legislative Commission on Data Practices and Personal Data Privacy
Chairs of Legislative Committees

