

Minnesota Security Consortium – MNSec

Bringing Information Security to Local Minnesota Governments

West Saint Paul Police Department

2021 ALPR Audit

Executive Summary

Prepared for the

West Saint Paul Police Department

August 12, 2021



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Background:

West Saint Paul Police Department retained the Minnesota Security Consortium to audit its agency's use of ALPRs against the requirements of MN Statute 13.824. The Minnesota Security Consortium does not operate or have access to their ALPR systems, therefore allowing it to audit the systems as an independent auditor. The City of West Saint Paul IT Staff and Police Department Administrative Staff provided their administrative access to their newly upgraded BOSS44 System during the audit to review audit criteria. West Saint Paul Police Department had their last ALPR Audit in 2019, and their first one in 2017, as required by Statute. West Saint Paul Police Department had ALPR systems on 1 Squad Car during the audit period and with no stationary ALPR units at the time of the audit.

Department Policy & Procedures:

West Saint Paul Police Department has an ALPR Policy in place entitled, "Policy #426: Automated License Plate Readers (ALPR's)." They had been keeping their policy updated last Reviewed by their Chief of Police in March of 2021 and it contained all the necessary policy statements. A review of this policy found that West Saint Paul Police Department was compliant in this part of the statute.

Record Retention:

The West Saint Paul Police Department ALPR BOSS4 administrative control panel was audited to ensure that each device setting was set for a retention period of no more than 60 days. Sampling attempts of older records showed that they were purged after 60 days. West Saint Paul Police Department was found to be compliant with this part of the statute.

Data Security and Access Control:

The West Saint Paul Police Department's ALPR system is protected by an Access Control system built into the BOSS4 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 West Saint Paul Police Department's Chief of Police. The BOSS4 ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. West Saint Paul Police Department was found to be compliant in this part of the statute.

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Data Classification:

West Saint Paul 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 West Saint Paul Police Department. Citizens can fill out the agency's Request for Police Data form. West Saint 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 the Operations Commander or other personnel as authorized by the Chief of Police. The requests are documented in the "ALPR Outside Agency Requests" form by agency name, requesting party and case number. As a result of these findings, West Saint Paul Police Department was found to be compliant with this part of the statute.

Public Log of Use:

West Saint Paul Police Department compiles monthly reports that contain the requirements of the 13.824 Subd.5. A few months of reports were not run while the old system was broken, and they upgraded to the new system. This was justified, in our opinion. The BOSS4 ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users. These public logs of use are readily available through a proper records request through the West Saint Paul Police Department. West Saint Paul Police Department was found to be compliant with this part of the statute.

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Notification to Bureau of Criminal Apprehension:

West Saint Paul Police Department made the required notification to the Bureau of Criminal Apprehension when it started its ALPR Program. This was validated on the BCA website on August 9, 2021. The West Saint Paul Police Department was found to be compliant with this part of the statute.

Biennial Public Accountability Audit:

West Saint Paul Police Department completed their initial ALPR Audits in 2017 and again in 2019. Command Staff and IT 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 BOSS4 ALPR Systems. West Saint Paul Police Department was found to be compliant with this part of the statute.

Breach Notification:

The West Saint Paul Police Department utilizes the City's Incident Response Policy which includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. West Saint Paul Police Department was found to be compliant with this part of the statute

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Conclusion:

Based on the results of the West Saint Paul Police Department ALPR Audit conducted by Minnesota Security Consortium, we can 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 West Saint Paul Police Department also demonstrated that the security, public accountability, and administration of the program, follows MN Statue 13.824.

This Audit was conducted and attested to by:



Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium

Submitted to:

West Saint Paul Police Department Chief of Police

Minnesota Commissioner of Administration

Legislative Commission on Data Practices and Personal Data Privacy

Chairs of Legislative Committees

Minnesota Legislative Library