

City of Rochester Police Department Automated License Plate Reader (ALPR) Biennial Audit Results Report December 19, 2024

At the request of the City of Rochester Police Department (RPD), 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
- Log of Use Required
- Biennial Audit
- Authorization to Access Data
- Notification to the Bureau of Criminal Apprehension (BCA)

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





| Control # | Statute Subd. | Control Objective | Testing Procedure | Testing Result |
|-------------|---------------------|--|--|-------------------------------------|
| Control # 1 | \$13.824 Subd. 2 | Control Objective Data collection; classification; use restrictions | Reviewed RPD Automated License Plate Reader Policy 427 sections on operations & data collection and retention. RPD provided screen print of sample license plate read from the ALPR system showing proper limited collection of data. RPD provided screen print of collected license plate data only being matched with data in the Minnesota license plate data | Testing Result No exceptions found |
| | | | file. RPD provided screen print from 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 RPD staff and officers responsible for ALPR system administration. | |

P: 763-543-2600

F: 763-543-2699 5750 Duluth Street, Golden Valley, MN 55422-4036 WWW.LOGIS.ORG





| Control # | Statute Subd. | Control Objective | Testing Procedure | Testing Result |
|-----------|-----------------|--|--|---------------------|
| 2 | §13.824 Subd. 3 | Destruction of data required | Reviewed RPD Automated License Plate Reader Policy 427 section on data collection and retention. | No exceptions found |
| | | | RPD provided screen print from ALPR System showing retention settings set to 60 days. | |
| 3 | §13.824 Subd. 4 | Sharing among law enforcement agencies | Reviewed RPD Automated License Plate Reader Policy 427 section on releasing ALPR data. | No exceptions found |
| | | | RPD provided screen print from 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 RPD staff and officers responsible for ALPR system administration. | |
| 4 | §13.824 Subd. 5 | Log of use required | Reviewed RPD Automated License Plate Reader Policy 427 sections on data collection and retention & log of use. RPD provided the most recent public log of use. | No exceptions found |
| 5 | §13.824 Subd. 6 | Biennial audit | Reviewed RPD Automated License Plate Reader Policy 427 section on accountability. | 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 | Reviewed RPD Automated License Plate | No exceptions found |
| | | access data | Reader Policy 427 sections on | |
| | | | operations and releasing ALPR data. | |
| | | | RPD provided screen print from ALPR | |
| | | | System showing retention settings set | |
| | | | to 60 days. | |
| | | | Reviewed RPD Information Security | |
| | | | Incident Management Policy. | |
| | | | Interviewed RPD staff and officers | |
| | | | responsible for ALPR system | |
| | | | administration. | |
| 7 | §13.824 Subd. 8 | Notification to | Reviewed RPD Automated License Plate | No exceptions found |
| | | Bureau of Criminal | Reader Policy 427 sections on | |
| | | Apprehension | operations and notifications. | |
| | | | Reviewed RPD License Plate Reader | |
| | | | listing on Bureau of Criminal | |
| | | | Apprehension website. | |

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

Local Government Information Systems (LOGIS) attested this audit on December 19, 2024:

Blake Tyra

LOGIS

Information Security Specialist

Respectfully submitted to the following:

James Franklin, City of Rochester, Chief of Police Minnesota Commissioner of Administration Legislative Commission on Data Practices and Personal Data Privacy Chairs of Legislative Committees

