

Olmsted County Sheriff's Office 2024 ALPR Audit (UTILITY System)

Executive Summary

Prepared for the

Olmsted County Sheriff's Office

April 18, 2025



Minnesota Security Consortium - MNSec

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Background:

Olmsted County Sheriff's Office retained the Minnesota Security Consortium to audit its agency's use of their ALPR program 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 Olmsted County Sheriff's Office Command and IT Staff provided their administrative access to the UTILITY ALPR System during the audit to review audit criteria. This Audit Period covered 9/1/2022 to 11/15/2024. Olmsted County Sheriff's Office had active ALPR systems on two Patrol Vehicles and other sources they have jurisdiction over in the County. No stationary ALPR units were reported at the time of the audit.

Department Policy & Procedures:

Olmsted County Sheriff's Office has an ALPR Policy in place entitled, "Policy 426: Automated License Plate Readers (ALPR)." They have been keeping their policy updated and it contained all the necessary policy statements. A review of this policy found that Olmsted County Sheriff's Office was compliant in this part of the statute.

Record Retention:

The Olmsted County Sheriff's Office ALPR UTILITY administrative control panel was audited to ensure that each setting was set for a retention period of no more than 60 days. Two of the devices sampled had 30-day retention settings at the device level. Olmsted County Sheriff's Office was found to be compliant with this part of the statute.

Data Security and Access Control:

The Olmsted County Sheriff's Office's ALPR system is protected by an Access Control system built into the UTILITY 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 Administrators are appointed by the Olmsted County Sheriff. Olmsted County Sheriff's Office was found to be compliant in this part of the statute.

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Data Classification:

Olmsted County Sheriff's Office 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 are readily available through a proper records request via the Olmsted County Sheriff's Office. Olmsted County Sheriff's Office 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 and reviewed through Agency Command. At the time of the Audit no inter-agency requests had been made. As a result of these findings, Olmsted County Sheriff's Office was found to be compliant with this part of the statute.

Public Log of Use:

The UTILITY ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. Access controls are in place for the least privilege access based on their role and job function. The Olmsted County Sheriff's Office has not maintained a standard set of Log of Use Reports, within the UTILITY system. Since the UTILITY system is now retired, MNSec has offered its assistance with any future ALPR systems and offered to work with ALPR vendors to comply with MN Statute 13.824, Subd. 5.

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Notification to Bureau of Criminal Apprehension:

Olmsted County Sheriff's Office made the required notification to the Bureau of Criminal Apprehension when it started its ALPR Program. This was validated on the BCA website. The Olmsted County Sheriff's Office was found to be compliant with this part of the statute.

Biennial Public Accountability Audit:

Olmsted County Sheriff's Office had their last audit in 2022 and plans on their next audit in 2 years. This audit incorporates an audit period of 26 months, and the auditor felt that this was appropriate for a single audit since the UTILITY equipment is no longer operational. Command and IT Staff were very cooperative throughout the entire audit process and understood the intent of the public accountability and provided easy access to policies and procedures, staff interviews, and audit of the UTILITY ALPR Systems. Olmsted County Sheriff's Office was found to be compliant with this part of the statute.

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Conclusion:

Based on the results of the Olmsted County Sheriff's Office 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 vehicle license plates. The Olmsted County Sheriff's Office also demonstrated that the security, public accountability, and administration of the program in compliance with MN Statue 13.824.

This Audit was conducted and attested to by:



Dimitrios Hilton

Senior Auditor, Minnesota Security Consortium

Submitted to:

Olmsted County Sheriff's Office

Minnesota Commissioner of Administration, Data Practices Office

Legislative Commission on Data Practices and Personal Data Privacy

Required Chairs of Legislative Committees

Minnesota Legislative Library