



## **Bloomington Police Department 2019 ALPR Audit**

### **Executive Summary**

**September 17, 2019**

#### **Background:**

Bloomington Police Department retained the LOGIS Security Specialist in order to audit the Agency's use of ALPRs against the requirements of MN Statute 13.824. The LOGIS Security Specialist does not have any direct or indirect access to the BOSS/PAGIS ALPR systems, therefore allowing it to audit the systems as an independent auditor. City of Bloomington IT Staff provided their administrative access to the BOSS/PAGIS in order to review audit criteria. Bloomington Police Department installed and began using their ALPR system in 2012. Bloomington Police Department signed an Audit Agreement on July 18, 2019. Bloomington Police Department has ALPR systems on 6 Squad Cars and 16 stationary ALPR units at the time of the audit.

#### **Department Policy & Procedures:**

Bloomington Police Department has an ALPR Policy in place entitled Bloomington Police Department Manual, Patrol Procedure 333: Automated License Plate Reader. They have been keeping it updated to reflect the most current version of MN Statute 13.824. A review of this policy found that Bloomington Police Department was compliant in this part of the statute.



**Data Security and Access Control:**

The Bloomington Police Department ALPR system is protected by Access Control users and groups that protect access to the ALPR Data on a permitted basis only. User accounts and role based accounts are reviewed on a regular basis by ALPR Administrators. The ALPR Administrator is appointed by the Bloomington Chief of Police. Police Officers and other department members that are selected by command to operate the ALPR in squad cars or to have ALPR data access are required to complete training, read through and acknowledge they understand the ALPR Policy and are then granted access to the system as an ALPR operator. The BOSS ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. Bloomington was found to be compliant in this part of the statute.

**Record Retention:**

The Bloomington Police Department ALPR Boss administrative control panel was audited to ensure that each device setting was set for a maximum retention period of no more than 60 days. All Devices were audited and the retention period was found to be set for 30 Days. Bloomington was found to be compliant with this part of the statute.

**Data Classification:**

Bloomington 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 Bloomington Police Department. Citizens can fill out the agency's General Data Access Request form. This request is reviewed by the Record's Supervisor, to ensure that it is consistent with the ALPR Statute 13.824. Bloomington 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 Investigative Commander or other personnel as authorized by the Chief of Police. The requests are documented by agency name, requesting party and case number and documented into the BOSS search to create an audit trail. Bloomington Police Department also keep their own log of read queries into the system. As a result of these findings, Bloomington was found to be compliant with this part of the statute.

**Public Log of Use:**

Bloomington Police Department makes available public log of use reports that contain the requirements of 13.824 Subd. 5. These public logs of use reports can be requested through a proper records request through the Bloomington Police Department. Bloomington was found to be compliant with this part of the statute.

**Notification to Bureau of Criminal Apprehension:**

Bloomington Police Department has made the required notification to the Bureau of Criminal Apprehension. This was validated on the BCA website. Bloomington was found to be compliant with this part of the statute.

**Biennial Public Accountability Audit:**

Bloomington Police Department installed their ALPR system in 2012 and completed their first ALPR Audit in 2017. 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 Systems. The Chief of Police acknowledges their intent to comply with MN Statute 13.824 and to continue audits every two years. Bloomington was found to be compliant with this part of the statute.



**Breach Notification:**

The Bloomington Police Department utilizes the City's Information Security Incident Response Plan which includes procedures for Breach Notification. This is consistent with MN Statute 13.055 and MN Statute 13.824. Bloomington was found to be compliant with these part of the statutes.

**Conclusion:**

Based on the results of the Bloomington 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 a 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:



Dimitrios Hilton

LOGIS Security Specialist

Submitted to:           Bloomington Chief of Police  
                                  Minnesota Commissioner of Administration  
                                  Legislative Commission on Data Practices and Personal Data Privacy  
                                  Chairs of Legislative Committee

