



Internal Audit Department
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Date: December 20, 2017
To: Sheriff Richard W. Stanek, Hennepin County Sheriff's Office
CC: Karen Marquardt, Director – Audit, Compliance & Investigation Services, Hennepin County
Re: Biennial Audit of the Hennepin County Sheriff's Office Automated License Plate Reader Program

Biennial Audit Summary Report

The City of Minneapolis Internal Audit Department (Internal Audit) completed an audit of the Automated License Plate Reader (ALPR) program managed and used by the Hennepin County Sheriff's Office (HCSO), in line with statutory audit requirements established by Minnesota Statute § 13.824, subd. 6.

The audit included an analysis of relevant statutory requirements, review of HCSO policies, evaluation of HCSO's management and use of ALPR technology and data. The audit period covered August 1, 2015 to August 31, 2017. The objectives of the audit included compliance with State requirements on:

- ALPR system logs
- ALPR data collection and classification
- ALPR data use and sharing
- ALPR data retention and destruction
- ALPR data accuracy, protection, and access

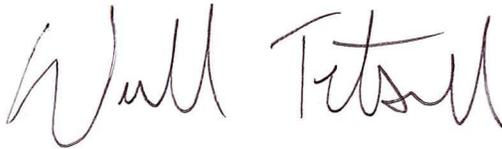
Audit Results

Internal Audit determined the following as a result of our audit:

- ALPR system logs
 - HCSO maintained data to be able to produce a public log of ALPR use with all elements required by Minn. Stat. § 13.824, subd. 5(a).
 - HCSO did not use fixed ALPRs and so did not need to maintain a log of locations required by Minn. Stat. § 13.824, subd. 5(b).
- ALPR data collection and classification
 - HCSO maintained records of the date and time ALPR data were collected, and maintained classification of the ALPR data in line with Minn. Stat. § 13.824, subd. 6(a).
 - Classifications were in line with Minn. Stat. § 13.824, subd. 2(b).
- ALPR data use and sharing
 - HCSO used ALPR data for legitimate law enforcement purposes, and shared data with other law enforcement agencies in line with Minn. Stat. § 13.824 subd. 2(a)(c)(d) and subd. 4(a)(b)(c).
- ALPR data retention and destruction
 - HCSO handled active and inactive investigative data, requests for preservation of data, and requests for destruction of data in line with Minn. Stat. § 13.824 subd. 3(b)(c)(d).

- HCSO's ALPR system was configured to automatically delete data in line with Minn. Stat. § 13.824 subd. 3(a).
 - Though the system was configured to purge data after 30 days, Internal Audit did observe that a system-generated log stored date, time, and license plate data for more than 60 days after collection. Per an ALPR system administrator, this log was discovered when they were responding to data requests for this audit. The ability to generate and access this log was restricted to two ALPR system administrators that were Hennepin County Administration Public Safety IT staff. This data did not appear to be utilized by HCSO, and locations and ALPR-collected pictures were not maintained past 30 days.
- ALPR data accuracy, protection, and access
 - HCSO maintained policies and procedures on data accuracy and safeguards in line with Minn. Stat. § 13.824 subd. 7(a).
 - HCSO had procedures on providing access to ALPR data and used a written process for provisioning access in line with Minn. Stat. § 13.824 subd. 7(b).
 - HCSO's ALPR system included role-based access in line with Minn. Stat. § 13.824 subd. 7(c).

The audit results show that HCSO generally conformed to MN State Statute 13.824 in the management and use of its ALPR technology and ALPR data. HCSO demonstrated a good faith effort to comply with the requirements and limits of the legislature and Internal Audit found no evidence of misuse.



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