



Golden Valley Police Department 2019 ALPR Audit

Executive Summary

January 6, 2020

Background:

Golden Valley Police Department retained LOGIS in order to audit the Agency's use of ALPRs against the requirements of MN Statute 13.824. The LOGIS Security Analyst 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 Golden Valley IT Staff provided their administrative access to the BOSS/PAGIS in order to review audit criteria. The Golden Valley Police Department installed and began using their ALPR system in 2013. Golden Valley Police Department signed an Audit Agreement on October 2, 2019. Golden Valley Police Department has ALPR systems on 2 Squad Cars, and no stationary ALPR units at the time of the audit.

Department Policy & Procedures:

Golden Valley Police Department has an ALPR Policy in place and has been keeping it updated to reflect the most current version of MN Statute 13.824. A review of this policy found that Golden Valley Police Department was compliant in this part of the Statute.





Data Security and Access Control:

The Golden Valley 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 Golden Valley 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. Golden Valley was found to be compliant in this part of the statute.

Record Retention:

The Golden Valley Police Department ALPR backend BOSS system was audited to ensure that each device setting was set for a retention period of no more than 60 days. Golden Valley was found to be compliant in this part of the Statute.

Data Classification:

Golden Valley 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 Golden Valley Police Department. Citizens can fill out the agency's General Data Access Request form. This request is reviewed by the Crime Analyst and Support Supervisor, to ensure that it is consistent with the ALPR Statute 13.824. Golden Valley 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 by agency name, requesting party and case number and documented. As a result of these findings, Golden Valley was found to be compliant with this part of the statute.

Public Log of Use:

Golden Valley Police Department compiles monthly reports that contain the requirements of 13.824 Subd. 5. The ALPR Administrator demonstrated how they created these reports, and ensured that license plate numbers are not being stored in these reports. These public logs of use are readily available through a proper records request through the Golden Valley Police Department. Golden Valley was found to be compliant with this part of the statute.

Notification to Bureau of Criminal Apprehension:

Golden Valley Police Department has made the required notification to the Bureau of Criminal Apprehension. This was validated on the BCA website. Golden Valley was found to be compliant in this part of the Statute.

Biennial Public Accountability Audit:

Golden Valley Police Department signed an ALPR audit agreement on October 2, 2019. 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. Golden Valley was found to be compliant with this part of the statute.





Breach Notification:

The Golden Valley 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. The City of Golden Valley was found to be compliant with these part of the statutes.

Conclusion:

Based on the results of the Golden Valley 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 Statute 13.824.

This Audit was conducted and attested to by:

A handwritten signature in black ink, appearing to read "Blake Tyra", is written over a horizontal line.

Blake Tyra

LOGIS Information Security Analyst

Submitted to: Jason Sturgis, City of Golden Valley, Chief of Police
Minnesota Commissioner of Administration
Legislative Commission on Data Practices and Personal Data Privacy
Chairs of Legislative Committees

