Maple Grove Police Department 2018 ALPR Audit

Executive Summary

April 17, 2018

Background:

Maple Grove 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. They installed and began using their ALPR system on July 7, 2016. Maple Grove Police Department signed an Audit Agreement on January 18, 2018. Maple Grove Police Department has ALPR systems on 2 Squad Cars and no stationary ALPR units at the time of the audit.

Department Policy & Procedures:

Maple Grove Police Department has an ALPR Policy in place entitled Policy #428: Automated License Plate Readers (ALPR). They have been keeping it updated to reflect the most current version of MN Statute 13.824. A review of this policy found that Maple Grove Police Department was compliant in this part of the statute.

Data Security and Access Control:

The Maple Grove 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 Maple Grove 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 SSL Encryption level of the Vigilant control panel was also deemed to be secured with a valid SHA-256 cert by a valid Certificate Authority. The Vigilant ALPR system also contains a robust audit trail which was sampled to determine if it is logging access by users properly. Maple Grove was found to be compliant in this part of the statute.
Record Retention:

The Maple Grove Police Department ALPR Vigilant administrative control panel was audited to ensure that each device setting was set for a retention period of no more than 60 days. Maple Grove was found to be compliant with this part of the statute.

Data Classification:

Maple Grove 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 Maple Grove Police Department. Citizens can fill out the agency's Information Disclosure Request form. Maple Grove 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 through a special Law Enforcement Use Only data request form which is then reviewed by the Maple Grove Professional Standards Division Captain or other personnel as authorized by the Chief of Police. Maple Grove was found to be compliant with this part of the statute.

Public Log of Use:

Maple Grove 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 Maple Grove Police Department. Maple Grove was found to be compliant with this part of the statute.
Notification to Bureau of Criminal Apprehension:

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

Biennial Public Accountability Audit:

Maple Grove Police Department installed their ALPR system on July 7, 2016 and signed an ALPR audit agreement on January 18, 2018. Command understood the intent of the public accountability and provided easy access to policies and procedures, staff interviews, and audit of the Vigilant ALPR Systems. The Chief of Police acknowledges their intent to comply with MN Statute 13.824 and to continue audits every two years. Maple Grove was found to be compliant with this part of the statute.

Conclusion:

Based on the results of the Maple Grove 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:

Dimitrios Hilton
LOGIS Security Specialist

Submitted to: Maple Grove Chief of Police
Minnesota Commissioner of Administration
Legislative Commission on Data Practices and Personal Data Privacy
Chairs of Legislative Committees.