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**City of St. Paul Police Department  
Automated License Plate Reader (ALPR) Biennial Audit  
Results Report  
December 21, 2023**

At the request of the City of St. Paul Police Department (SPPD), LOGIS has conducted the biennial audit of their Automated License Plate Reader (ALPR) Systems pursuant to Minnesota Statute §13.824 Subd. 6.

Minnesota Statute §13.824 data elements include:

- Data Collection, Classification and Use Restrictions
- Destruction of Data
- Sharing Among Law Enforcement Agencies
- Log of Use Required
- Biennial Audit
- Authorization to Access Data
- Notification to the Bureau of Criminal Apprehension (BCA)

After analysis of the statutory requirements and evaluation of the City of St. Paul Police Department's management and use of Automated License Plate Reader technology, LOGIS has found the City of St. Paul Police Department in compliance with Minnesota Statute §13.824 based on the following findings:



Control #	Statute Subd.	Control Objective	Testing Procedure	Testing Result
1	§13.824 Subd. 2	Data collection; classification; use restrictions	<p>Reviewed SPPD License Plate Reader Policy 445.17 section on data collection, classification &amp; use restrictions.</p> <p>SPPD provided screen print of sample license plate read showing proper limited collection of data.</p> <p>SPPD provided screen prints of license plate data files being pulled only from the state of Minnesota.</p> <p>SPPD provided screen print of LEONARDO ALPR system requiring Reason for Action when looking up plate reads. Reasons for Action must include case number, type of case, description and reason.</p> <p>Interviewed SPPD staff and officers responsible for ALPR system administration.</p>	No exceptions found



Control #	Statute Subd.	Control Objective	Testing Procedure	Testing Result
2	§13.824 Subd. 3	Destruction of data required	<p>Reviewed SPPD License Plate Reader Policy 445.17 section on destruction of data.</p> <p>SPPD provided screen print from LEONARDO ALPR System showing retention settings set to 60 days.</p>	No exceptions found
3	§13.824 Subd. 4	Sharing among law enforcement agencies	<p>Reviewed SPPD License Plate Reader Policy 445.17 section on sharing among law enforcement agencies.</p> <p>SPPD provided screen print of LEONARDO ALPR system requiring Reason for Action when looking up plate reads. Reasons for Action must include case number, type of case, description and reason.</p> <p>Interviewed SPPD staff and officers responsible for ALPR system administration.</p>	No exceptions found
4	§13.824 Subd. 5	Log of use required	<p>Reviewed SPPD License Plate Reader Policy 445.17 section on authorization to access data.</p> <p>SPPD provided the most recent public log of use.</p>	No exceptions found
5	§13.824 Subd. 6	Biennial audit	<p>Reviewed SPPD License Plate Reader Policy 445.17 section on biennial audit.</p> <p>Reviewed MN Legislative Reference Library for past audits.</p>	No exceptions found



Control #	Statute Subd.	Control Objective	Testing Procedure	Testing Result
6	§13.824 Subd. 7	Authorization to access data	<p>Reviewed SPPD License Plate Reader Policy 445.17 sections on authorization to access data and destruction of data.</p> <p>SPPD provided screen print from LEONARDO ALPR System showing retention settings set to 60 days.</p> <p>Interviewed SPPD staff and officers responsible for ALPR system administration.</p>	No exceptions found
7	§13.824 Subd. 8	Notification to Bureau of Criminal Apprehension	<p>Reviewed SPPD License Plate Reader Policy 445.17 section on Notification to Bureau of Criminal Apprehension.</p> <p>Reviewed SPPD License Plate Reader listing on Bureau of Criminal Apprehension website.</p>	No exceptions found





The findings in the Automated License Plate Reader Audit are impartial and based on information and documentation provided by the City of St. Paul Police Department and examined by LOGIS information security staff and management. It demonstrates that the security, public accountability and administration of the SPPD ALPR program is in compliance with MN Statute §13.824.

Local Government Information Systems (LOGIS) attested this audit on December 21, 2023:

A handwritten signature in black ink that reads "Blake Tyra".

Blake Tyra  
LOGIS  
Information Security Specialist

Respectfully submitted to the following:

Eric Kammerer, City of St. Paul, Police Commander  
Minnesota Commissioner of Administration  
Legislative Commission on Data Practices and Personal Data Privacy  
Chairs of Legislative Committees

