

 **DEPARTMENT OF
ADMINISTRATION**
DATA PRACTICES

July 9, 2025

Public Safety Director Ryan George
City of Fridley Public Safety Department
7071 University Ave NE
Fridley, MN 55432

Dear Director George:

The Data Practices Office, on behalf of the Commissioner of Administration, has received the Fridley Police Department's automated license plate reader biennial audit report completed in 2024.

As required by law, the review of the report summarizing the results of the audit covers the audit of records to determine whether data currently in the records are classified, how the data are used, whether data are destroyed as required, and that the audit verified the Fridley Police Department's compliance with data accuracy, protection, and legitimate access procedures and applicable data breach notification requirements.

According to the report, the Code 4 Group found that the Fridley Police Department complies with Minnesota Statutes, section 13.824.

If you have any questions, please contact Casey Carmody at casey.carmody@state.mn.us or 651.201.2505.

Sincerely,



TAYA MOXLEY-GOLDSMITH
DIRECTOR, DATA PRACTICES OFFICE
MINNESOTA DEPARTMENT OF ADMINISTRATION

By: Casey Carmody
Assistant Director, Data Practices Office



Automated License Plate Reader (ALPR) Audit Report

Prepared for

Fridley Police Department

November 20, 2024



Introduction

In October 2024, Code 4 Group, led by Hans Link, conducted an independent audit of the Fridley Police Department's ALPR system at the agency's request. The audit's objective was to examine and assess Fridley Police Department's compliance with Minnesota statute §13.824 governing the use of ALPR devices and their data.

Statute Elements: §13.824

- Data collection, classification, use restrictions
- Destruction of data
- Sharing among law enforcement agencies
- Log of use required
- Biennial audit
- Notification to Bureau of Criminal Apprehension (BCA)



Preliminary Information

In October of 2022, Fridley Police Department began testing the Rekor Scout ALPR system. Due to a myriad of technical issues, Rekor's product was not implemented in a meaningful way until months later. In October of 2023, Fridley Police department opted to begin using Flock ALPR. The scope of the audit will cover both Flock and Rekor's ALPR systems between the period of October 2022 and October 2024.

Fridley Police Department General Order 429 (Automated License Plate Reader) was publicly available on the city's website and is referenced in this report as GO 429.

Link: <https://www.fridleymn.gov/files/assets/city/v/1/public-safety/documents/police-forms-and-policies/429-automated-license-plate-reader.pdf>

Data collection, classification, use restrictions

MSS §13.824 Subd. 2

Fridley Police Department considers ALPR data to be private unless access is permitted by law. GO 429, Sections V & VII address access and use of stored ALPR data. The policy was found to be in compliance with state statutes. Sample license plate reads from both systems showed that the data was only being matched against the Minnesota license plate data file and that the reads properly limited collection of data. Both systems required the user to enter a justification when searching license plate reads which could be viewed through the software's audit reports.

Destruction of data

MSS §13.825 Subd. 3

GO 429, Section VI describes the policies for ALPR data retention and is compliant with state statute. Both ALPR systems retention settings were set in compliance with policy and state statute. Sample data with a date range greater than 60 days was searched. No ALPR data outside the 60 day window could be retrieved and the audit trails remain searchable, in compliance with state statute.



Sharing among law enforcement agencies

MSS §13.824 Subd. 4

GO 429, Section VIII was reviewed and found to be compliant with state statutes.

Rekor and Flock both allow agencies using the same products to share ALPR data. Requests need to be manually approved and a record of each request is stored within the system.

Both ALPR systems require users to enter a justification when searching license plate reads. Audit trails in both systems makes clear the user, agency, and justification for the search.

Log of use required

MSS §13.824 Subd. 5

GO 429, Section V, C.2 describes the required data for the public log of use and is compliant with state statute.

The most recent logs of use were viewed and found to be compliant.

Biennial audit

MSS §13.824 Subd. 6

GO 429, Section V, C.3 establishes that a biennial audit shall be conducted in compliance with state statute. This is the first ALPR audit for Fridley Police Department since the systems were put into use in October of 2022. The staff was cooperative, prepared, and supportive of the audit process. Their next audit will cover the period of October 2024 to October 2026.



Authorization to access data

MSS §13.824 Subd. 7

GO 429, Section V and VII detail appropriate procedures, training, and use of ALPR systems. The policies conform to state statute. City IT also maintains an incident response plan which governs the investigation and response to data breaches. The incident response plan is compliant with MSS §13.055 and MSS §13.05.

Both ALPR systems provide role-based access controls which give users the minimum access needed to perform their work. Accounts are created and monitored by system administrators and the systems keep a detailed audit trail of user activity. The logs were sampled and found to accurately reflect access made during the audit.

Notification to BCA

MSS §13.824 Subd. 8

GO 429, Section V, C.1 establishes that all fixed ALPR shall be reported to the BCA within 10 days of installation or use. The BCA maintains a public list of reported ALPR deployments which was validated against the fixed cameras in use at the time of the audit. Fridley Police Department was found to be in compliance with state statute.

Link: <https://dps.mn.gov/agencies-use-lprs-lpr>



Conclusion

This report is based on information derived from on-premise visits, interviews, documentation provided by Fridley PD, and publicly available resources.

This report and its findings were prepared independently from and exclusively for the City of Fridley and the Fridley Police Department. This report demonstrates that the Fridley Police Department ALPR Program is in compliance with Minnesota State Statutes §13.824.

Audit conducted and prepared by

A handwritten signature in blue ink, appearing to read 'Hans Link', is written over a horizontal line.

Hans Link

Consultant, Code 4 Group