

INTRADEPARTMENTAL CORRESPONDENCE

September 21, 2022
14.2

TO: The Honorable Board of Police Commissioners

FROM: Chief of Police

SUBJECT: AUTOMATED LICENSE PLATE RECOGNITION AUDIT (AD NO. 21-005)

RECOMMENDED ACTION

It is recommended that the Board of Police Commissioners REVIEW and APPROVE the attached Automated License Plate Recognition Audit.

DISCUSSION

Audit Division conducted the Automated License Plate Recognition Audit to evaluate compliance with Department policies and procedures.

If additional information regarding this audit is required, please contact Senior Management Analyst II Sharon Sargent, Acting Commanding Officer, Audit Division, at (213) 486-8480.

Respectfully,



MICHEL R. MOORE
Chief of Police

Attachment

LOS ANGELES POLICE DEPARTMENT

***AUTOMATED LICENSE PLATE
RECOGNITION AUDIT
(AD No. 21-005)***



Conducted by
AUDIT DIVISION

MICHEL R. MOORE
Chief of Police

August 2022

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AD No. 21-005

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AUTOMATED LICENSE PLATE RECOGNITION AUDIT
Conducted by Audit Division
2021

OVERVIEW

Audit Division (AD) conducted the Automated License Plate Recognition (ALPR)¹ Audit to determine whether the Department implemented California State Auditor (CSA) recommendations and if the *Department Manual* also addresses these issues. In February 2020, the CSA found that the Department did not provide sufficient privacy protections for images collected by ALPRs and shared with other jurisdictions.

Automated License Plate Readers are high-speed, computer-controlled camera systems that automatically capture all license plate numbers that come into view, along with data on location, date, and time. The Department's ALPR cameras are only used to collect and record information that is exposed to public view where there is no reasonable expectation of privacy. The ALPR system has proven to be effective in reducing recovery times of stolen and lost vehicles, is a valuable tool in criminal investigations, and represents an important factor in building efficiencies within field operations. When combined with computer algorithms, the ALPR reads and converts images of license plates and the characters they contain into data. The data collected by an ALPR includes the on-site photo of the vehicle license plate, the date, time, and the location the photo was taken, as well as the identification number of the ALPR that captured the information.

In this audit completed in 2021, auditors determined the following:

- The Department created a policy to ensure protection of data privacy and security (*Objective No. 1*);
- User accounts were properly granted 100 percent of the time (*Objective No. 2*);
- Inactive user accounts were properly deactivated 44 percent of the time (*Objective No. 3*);
- Physical Security of the ALPR Server and Remote Access to ALPR Data met the standards (*Objective No. 4*);
- ALPR Request and Records Access Information were complete, tracked, and maintained 94 percent of the time (*Objective No. 5*);
- Results of the ALPR requests were generally provided to the requestor within 24 hours, 97 percent of the time (*Objective No. 6*); and,
- All System Administrators received the required training (*Objective No. 7*).

¹ The terms *Automated License Plate Readers* (or ALPR, used by the CSA), and *Automated License Plate Recognition* (used by the Department) are used interchangeably in this report.

BACKGROUND

ALPR System Contract

The Department did not renew Palantir's service and maintenance agreement when it ended in December 2020. Therefore, beginning December 2020, all license plate data collected by the Department's ALPR cameras is stored on the Department's on-premise Back Office System Software (BOSS) server. Its access is restricted to ALPR system administrators at Innovation Management Division (IMD), which is part of the Department's Information Technology Bureau (ITB). The system administrators' roles are handling ALPR requests submitted by Department employees.

The audit was conducted during 2021 when the Department did not have a contracted vendor. During the audit, AD learned that the City of Los Angeles (City) was in the process of negotiating an agreement with a new vendor, Motorola Solutions, Inc. (Motorola). Despite the absence of an existing vendor, AD performed the audit based on the Department's ALPR policies and procedures. On February 1, 2022, the Board of Police Commissioners (BOPC) approved the Professional Services Agreement (Agreement) between the City and Motorola who will provide professional services to manage the Department's ALPR system. The Agreement was approved by the Los Angeles City Council in June 2022. The IMD estimated that the ALPR system serviced by Motorola will be fully operational by the end of August 2022. Motorola and IMD are working together to configure user roles and permissions, transferring data, and loading the entire Department into the application for ease in activating user accounts once they complete the required training.

CSA 2020 Audit

The CSA audited four local law enforcement agencies' use of automated license plate readers in 2020. The report, *Automated License Plate Readers: To Better Protect Individuals' Privacy, Law Enforcement Must Increase Its Safeguards for the Data It Collects (2020 Report)* contained findings, conclusions, and recommendations for the following agencies: Fresno Police Department, Marin County Sheriff's Office, Sacramento County Sheriff's Office, and the Los Angeles Police Department (Department). In the *2020 Report*, the CSA provided the Department with the following recommendations:²

1. Establish and implement ALPR policies;
Department Action: The Department published Special Order No. 31, 2020 (SO 31) "Automated License Plate Recognition Usage and Privacy Policy-Established," dated December 10, 2020. (Assessed in Objective No. 1.)

² See Addendum I, (CSA, *Automated License Plate Readers: To Better Protect Individuals' Privacy, Law Enforcement Must Increase Its Safeguards for the Data It Collects*, CSA Report 2019-118, February 2020, "Summary," p. 5).

2. Implement needed ALPR data security;
Department Action: It was addressed in SO 31 “Data Security and Security Breach of Notification.” (Assessed in Objective No. 2.)
3. Update vendor contracts with necessary data safeguards;
Department Action: It was addressed in SO 31 “Custodian of ALPR System and Records.” The new Motorola contract specifically addresses data safeguards.
4. Ensure that sharing of ALPR images is done appropriately;
Department Action: It was addressed in SO 31 “Sharing of ALPR Data.” During the audit, LAPD was unable to share ALPR data with other agencies due to the absence of a contracted vendor. The new Motorola contract specifically addresses data safeguards. After the transition to the new ALPR system, LAPD will be able to share ALPR data with other agencies using Motorola.
5. Evaluate and re-establish data retention periods;
Department Action: It was addressed in SO 31 “Retention and Deletion of ALPR Data and Retaining ALPR Data Beyond the Two-Year Deletion Period.” This was not specifically tested. Auditors learned that the ALPR system used during the audit period had limited capabilities and was unable to archive data as required by SO 31. Once the transition to the new ALPR system is estimated to be completed in August 2022, the stored data can be archived or deleted as appropriate, and AD will conduct another audit and assess this area when applicable.
6. Develop and implement procedures for granting and managing user accounts; and,
Department Action: It was addressed in SO 31 sections titled “Persons Authorized to Access and Use the ALPR Data” and “Custodian of ALPR System and Records.” (Assessed in Objective Nos. 1-3.)
7. Develop and implement ALPR System oversight.
Department Action: It was addressed in SO 31 “Records of Access and Periodic System Audits.” (Assessed in Objective No. 1.)

In its response to the CSA, the Department summarized a series of continuing practices and action plans that included the following:³

1. Implement an ALPR Policy to ensure protection of individuals’ privacy;
2. Continue to provide ALPR training;
3. Perform an assessment of the systems’ data security features and retention periods for ALPR images to evaluate any need for adjustment; and,
4. Perform periodic audits to evaluate the information the system captures when accessed by Department users.

³ See Addendum II.

This was the first audit AD conducted on the Department's use and management of the ALPR System.

Components of the ALPR System

An ALPR System consists of the following three parts:

1. The mobile or fixed camera.

The Department operates cameras, mounted on patrol cars and affixed to stationary structures such as buildings and light poles, that capture color images within its field of view. These images include license plate numbers and the dates, times, and locations associated with the images.

2. The software that reads and converts license plate images into data.

As the Department previously contracted with Palantir, a third-party vendor, it has been using all the software provided by Palantir for conducting ALPR searches. Currently, the access is restricted to a limited number of employees within Innovation Management Division (IMD) who are conducting the searches of ALPR information for the requestors.

3. The searchable database that stores the data.

The Department stores the images in its on-premises BOSS server. This searchable database is a web-based application. Its software extracts license plate numbers from the images and stores them, along with plate numbers, dates, times, and locations of the images.

SCOPE AND METHODOLOGY

Auditors obtained a list from IMD of all ALPR requests made between January 1, 2021, and May 31, 2021. During this period, IMD received 111 ALPR Request Forms containing 259 inquiries for license plate or partial license plate numbers submitted by Department employees. Of the 259 license plate numbers, 170 returned with one or more "hit" results. The remaining 89 returned with "no-hit" results.⁴

Auditors used different population subsets in each of the objectives to measure the Department's performance surrounding the ALPR System. Each objective describes the subsets used to make the assessments.

The audit findings are summarized in the following table:

⁴ A 'hit' is a search result of identifying data associated with the license plate number submitted. A 'no-hit' is a search result with no data associated with the license plate number submitted.

Summary of Findings by Objective

Objective No.	Description of Objective	Number Meeting Standard/Evaluated	Percent Meeting Standard
1	Department ALPR Policy Established and Implemented	Met Standard	
2	User Account Properly Granted	21/21	100%
3	Inactive User Accounts Properly Deactivated	4/9	44%
4	Physical Security of the ALPR Server and Remote Access to ALPR Data	Met Standard	
5	ALPR Request and Records Access Information Complete, Tracked, and Maintained	104/111	94%
6	ALPR Inquiry Response to Requestor Generally Within 24 Hours (Performance Assessment)	31/32	97%
7	System Administrators Trained (Performance Assessment)	12/12	100%
Other Related Matters – Performance Assessment			
	Joint Regional Intelligence Center Link Provided to Requestor	30/32	94%

DETAILED FINDINGS

Objective No. 1 – Department ALPR Policy Established and Implemented

Criteria

California State Auditor, *Automated License Plate Readers: To Better Protect Individuals’ Privacy, Law Enforcement Must Increase Its Safeguards for the Data It Collects*, California State Auditor Report 2019-118, February 2020, “Recommendations,” p. 40, states:

To ensure that their ALPR policies contain all of the required elements as specified in state law, by August 2020, Fresno, Los Angeles, Marin, and Sacramento should review their policies and draft or revise them as necessary.

California Civil Code, Division 3, “Obligations,” Part 4, “Obligations Arising from Particular Transactions,” Title 1.81.23, “Collection of License Plate Information,” Section 1798.90.51, states:

An ALPR operator shall do all of the following:

- (a) Maintain reasonable security procedures and practices, including operational, administrative, technical, and physical safeguards, to protect ALPR information from unauthorized access, destruction, use, modification, or disclosure.
- (b) (1) Implement a usage and privacy policy in order to ensure that the collection, use, maintenance, sharing, and dissemination of ALPR information is consistent with respect for individuals’ privacy and civil liberties. The usage and privacy policy shall be

available to the public in writing, and, if the ALPR operator has an internet website, the usage and privacy policy shall be posted conspicuously on that internet website.

(2) The usage and privacy policy shall, at a minimum, include all of the following:

(A) The authorized purposes for using the ALPR system and collecting ALPR information.

(B) A description of the job title or other designation of the employees and independent contractors who are authorized to use or access the ALPR system, or to collect ALPR information. The policy shall identify the training requirements necessary for those authorized employees and independent contractors.

(C) A description of how the ALPR system will be monitored to ensure the security of the information and compliance with applicable privacy laws.

(D) The purposes of, process for, and restrictions on, the sale, sharing, or transfer of ALPR information to other persons.

(E) The title of the official custodian, or owner, of the ALPR system responsible for implementing this section.

(F) A description of the reasonable measures that will be used to ensure the accuracy of ALPR information and correct data errors.

(G) The length of time ALPR information will be retained, and the process the ALPR operator will utilize to determine if and when to destroy retained ALPR information.

Audit Procedures

Auditors reviewed *SO 31* which was codified into the *Department Manual*.⁵ Auditors assessed whether Department policy addressed each of the elements specified in the referenced sections of the *California Civil Code*.

The Department met the standard for this objective if *SO 31* contained the information required by the above-referenced sections of the *2020 Report* and the *California Civil Code*.

⁵ See *Special Order No. 31*, December 10, 2020, "Automated License Plate Recognition Usage and Privacy Policy – Established"; and *Department Manual*, 1st Quarter 2021, Vol. 3, "Management Rules and Procedures," Section 568.53, "Automated License Plate Recognition Usage and Privacy Policy."

Findings

Each of the required conditions met the standards for this objective. The State Auditor's Report recommended that the agency's policies reflect the requirements within the Civil Code referenced in the criteria identified on page five. Each of the items identified within the Civil Code is addressed and referenced in *SO 31*.

Objective No. 2 – User Account Properly Granted

Criteria

Department Manual, 1st Quarter 2021, Vol. 3, "Management Rules and Procedures," Section 568.53, "Automated License Plate Recognition Usage and Privacy Policy," states:

Persons Authorized to Access and Use the ALPR Data. There are two types of users authorized to use the ALPR System: ALPR System Administrators and ALPR Data Users. Each type of user is given different access controls, responsibilities, and training.

ALPR System Administrators - Defined. Department personnel assigned within Information Technology Bureau (ITB) have the highest access rights to the ALPR System. The ITB is responsible for ensuring the maintenance of the ALPR server, database, application software, and verifying proper operation of the system. The ALPR System Administrators are also responsible for assisting in any reports of inoperability or malfunction of ALPR-equipped vehicles.

ALPR Data Users - Defined. Any active Department employees (both sworn and civilian) or independent contractors, who have received written authorization from their supervisor and have been granted permission from ITB to query the ALPR System.

Note: Employees equipped with the ALPR Cameras in their Department vehicles may receive an ALPR hit, and when used for this purpose officers receive on-the-job training. They have no ability to add, remove, or change any information in the ALPR System.

Audit Procedures

Auditors reviewed the Department's ALPR Users List that identified a total of 21 user accounts which included both System Administrators and data users. All 21 user accounts were reviewed to determine if each account access was granted based on the job duties or function matching the ALPR user account definitions above.

The Department met the standard for this objective if user access was granted based on the job duties or functions matching the ALPR user account definitions above.

Findings

Each of the 21 (100 percent) user accounts met the standards for this objective.

Objective No. 3 – Inactive User Accounts Properly Deactivated

Criteria

Department Manual, 1st Quarter 2021, Vol. 3, “Management Rules and Procedures,” Section 568.53, “Automated License Plate Recognition Usage and Privacy Policy,” states:

Note: Whenever an ALPR System Administrator or an ALPR Data User separates from the Department, their user account in the ALPR System shall be promptly deactivated and deleted by ITB.

Audit Procedures

Further review of the 21 user accounts identified in Objective No. 2 revealed that nine were inactive. Auditors reviewed these nine inactive user accounts to determine if they were deactivated.

The Department met the standards for this objective if inactive accounts were identified and deactivated.

Findings

Four (44 percent) of the nine inactive accounts met the standards for this objective and were attributed to personnel no longer assigned to IMD. The remaining five were no longer in use; however, they were not deactivated, and thus did not meet the standards. These five accounts were attributed as follows:

- Two dispatcher accounts for two ALPR cameras at Southeast Division’s station gate were inoperable (broken); and,
- Three external law enforcement agency accounts LAPD used to share data under agreements.⁶ The agreements have expired.

Auditors notified IMD about the findings and IMD took immediate corrective action by deactivating these accounts. The ALPR Users List will be reviewed monthly to ensure that accounts that are no longer in use are deactivated and removed (see Recommendation).

⁶ The two agencies were the Los Angeles County Sheriff’s Department (one account) and the Long Beach Police Department (two accounts).

Objective No. 4 – Physical Security of the ALPR Server and Remote Access to ALPR Data

Criteria

Department Manual, 1st Quarter 2021, Vol. 3, “Management Rules and Procedures,” Section 568.53, “Automated License Plate Recognition Usage and Privacy Policy,” states:

Data Security & Security Breach of Notification. The ALPR data shall be stored on a Department-approved storage system compliant with standards established by the Federal Bureau of Investigation’s Criminal Justice Information System (CJIS). Physical and remote access to the data storage system shall be restricted to authorized persons only. Any Department data storage system approved to store ALPR data shall be physically located on property owned by the City of Los Angeles and/or within California Department of Justice compliant cloud systems.

Audit Procedures

Auditors inquired with IMD regarding whether 1) the Department’s BOSS server storage system is approved by the Department; 2) the physical and remote access to the data storage system is restricted to authorized persons only; and, 3) the ALPR data storage system is physically located on property owned by the City of Los Angeles. Auditors conducted a performance assessment based on IMD personnel’s responses to the inquiry.

The Department met the standards if the above three areas were satisfied.

Findings

The Department met the standards for this objective.

Objective No. 5 – ALPR Request and Records Access Information Complete, Tracked, and Maintained

Criteria

Department Manual, 1st Quarter 2021, Vol. 3, “Management Rules and Procedures,” Section 568.53, “Automated License Plate Recognition Usage and Privacy Policy,” states:

Authorized Uses. The ALPR System and the recording of ALPR data shall only be retained, accessed, and used for the following official Department purposes:

- Criminal investigations or proceedings;
- Non-criminal investigations (e.g., missing and found persons);
- Administrative investigations or proceedings (e.g., pursuit and complaint investigations);
- Civil investigations or proceedings;

- Situational awareness operations; and,
- Responses to cognizable threats to public safety.

Department Manual, 1st Quarter 2021, Vol. 3, “Management Rules and Procedures,” Section 568.53, “Automated License Plate Recognition Usage and Privacy Policy,” states:

Records of Access and Periodic System Audits. The ITB shall ensure that a database of records of ALPR end-user activity, including all queries to the ALPR System is maintained. At a minimum, the records of access shall include the following:

- The date and time the information is accessed;
- The license plate number or other data elements used to query the ALPR System;
- The username of the person who accessed the information; and,
- The identified authorized purpose for accessing the information.

Audit Procedures

Auditors reviewed the ALPR Request Forms submitted by Department employees and the spreadsheet IMD used to track ALPR System access to complete the requests. Both the forms and the spreadsheet were assessed for completeness to include the requester’s information, the license plate(s) being requested, and that a valid reason was indicated. Additionally, auditors assessed IMD’s Excel spreadsheet to ensure that it properly tracked and retained the data access records. The ALPR Request Forms were also inspected to determine their maintenance and retention.

The Department met the standards for this objective if the documentation of the request was properly maintained, the requester had a right to make the request, the request was for a legitimate purpose, and ALPR access by the System Administrators was tracked on the spreadsheet.

Findings

One hundred and four (94 percent) of the 111 ALPR requests met the standards for this objective. The remaining seven ALPR Request Forms are described below:

- Six ALPR requests were recorded on the Excel spreadsheet used to track the records of access, but the ALPR Request Forms could not be located; and,
- One ALPR Request Form was filed but was not recorded on the Excel spreadsheet.

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Objective No. 6 – ALPR Inquiry Response to Requestor Generally Within 24 Hours
(Performance Assessment)

Criteria

The Department does not have a policy regarding a timeline to respond to an ALPR request. However, IMD's operational practice is that after IMD receives an ALPR request, the assigned System Administrator must make a reasonable effort to conduct a search, provide the requestor with search results, and copies of records, generally within 24 hours.

Assessment Procedures

To assess IMD's response time to each ALPR request, AD focused on the 170 license plate numbers on all 32 request forms that returned with a hit result.⁷ Auditors reviewed ALPR Request Forms, IMD's Excel spreadsheet, and the email correspondence between the requestor and the assigned IMD System Administrator to determine if the request was processed, and search results and documents provided to each requestor within their general operational practice of 24 hours. Auditors elected to use 24 hours as the standard to assess the timeliness of the requests.

The Department met the condition for this objective if the requested information was provided to the requestor within 24 hours.

Results

Thirty-one (97 percent) of the 32 license requests met the condition for this objective.

One request form listed 122 license plate numbers and it took the assigned IMD System Administrator four calendar days to complete due to the voluminous data searches involved. When the System Administrator informed the requestor of the inability of searching for and reviewing 122 license plates within the 24-hour timeframe, the auditors noted the requestor replied via email indicating he/she fully understood the reason for the delay.

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⁷ One request involved 122 license plates to be reviewed. The remaining 31 requests involved 48 license plates to be reviewed.

Objective No. 7 – System Administrator Trained (Performance Assessment)

Criteria

Department Manual, 1st Quarter 2021, Vol. 3, “Management Rules and Procedures,” Section 568.53, “Automated License Plate Recognition Usage and Privacy Policy,” states:

ALPR System Administrators. All ALPR System Administrators shall receive training to fulfill their job responsibilities by a current ALPR System Administrator and/or vendor prior to accessing the ALPR System as an ALPR System Administrator.

Assessment Procedures

A review of the policy indicated that the training was not required to be documented. Auditors asked IMD whether the Department conducted ALPR data user training in the following ways:

- Online training relative to the ALPR operating manual: “Police ALPR Graphical Interface Software (PAGIS) User/Admin Training”;
- On-the-job training for System Administrator upon arrival at IMD; and/or,
- Training provided to the System Administrators by an ALPR vendor.

Auditors determined that IMD has 12 System Administrators that have been in their assignments for an extended period and received internal training throughout their tenure at IMD, but this training was not documented. Auditors elected to conduct a performance assessment of the 12 System Administrators for this objective. The Department met the condition for this objective if they indicated they have received training.

Results

Each (100 percent) of the 12 System Administrators met the condition for this objective.

OTHER RELATED MATTERS – PERFORMANCE ASSESSMENT

Joint Regional Intelligence Center Link Provided to Requestor

Due to the lack of a contracted vendor to manage the ALPR system and related search requests, IMD System Administrators emailed the results of the search requests from the Department’s on-premise BOSS server, along with an attached Joint Regional Intelligence Center (JRIC) link to the requestor. The JRIC is on the Palantir’s web application where it could be accessed by other law enforcement agencies in the region who are using the Palantir user interface.⁸ Though this is a temporary solution before the transition to Motorola, the Department mitigated the lack of available data by providing the JRIC link. While not required by Department policy and

⁸ The JRIC is a regional center dealing with threats throughout California and acts as a liaison with law enforcement agencies.

therefore, not suitable for audit, AD conducted a performance assessment to determine if IMD System Administrators provided these resources to the requestors.

To determine whether an IMD System Administrator provided the JRIC link, AD reviewed the 170 license plate numbers that returned a hit result by obtaining the email correspondence between the requestor and the IMD System Administrator assigned the request. Of IMD's responses to the 32 requestors, auditors found that IMD System Administrators attached the JRIC link to 30 (94 percent).

RECOMMENDATION

Auditors made the following **one** recommendation:

It is recommended that the Information Technology Bureau and Innovation Management Division develop mechanisms to promptly deactivate Automated License Plate Recognition System Administrators and data user accounts that are no longer in use, to ensure data integrity. Prompt deactivation should be defined as the next action taken after the user account is determined to no longer be in use. *See* Objective No. 3.

No other significant concerns noted.

ACTIONS TAKEN/MANAGEMENT RESPONSE

Auditors presented the findings and the draft report to the Commanding Officer, IMD, who expressed general agreement with the audit and provided a response. *See* Addendum III.

APPENDIX I

Audit Division Contact: Police Performance Auditor III Sophia Liu, Serial No. N3298, (213) 486-8480 or N3298@LAPD.online, made key contributions to this audit.

Handwritten signature of Sophia Liu in black ink, followed by the text 'N3298'.

SOPHIA LIU
Project Manager, Audit Division
Police Performance Auditor III

Handwritten signature of Cynthia Chow in black ink, followed by the text '38158'.

CYNTHIA CHOW
Acting Officer in Charge, Audit Division
Sergeant II

Handwritten signature of Trina Unzicker in blue ink, followed by the text 'Ton'.

TRINA UNZICKER
Commanding Officer, Audit Division
Police Administrator I

- Require Justice to develop and issue guidance to help local law enforcement agencies identify and evaluate the types of data they are currently storing in their ALPR systems. The guidance should include the necessary security requirements agencies should follow to protect the data in their ALPR systems.
- Establish a maximum data retention period for ALPR images.
- Specify how frequently ALPR system use must be audited and that the audits must include assessing user searches.

Law Enforcement Agencies

To address the shortcomings this audit identified, Fresno, Los Angeles, Marin, and Sacramento should do the following:

- Improve their ALPR policies.
- Implement needed ALPR data security.
- Update vendor contracts with necessary data safeguards.
- Ensure that sharing of ALPR images is done appropriately.
- Evaluate and reestablish data retention periods.
- Develop and implement procedures for granting and managing user accounts.
- Develop and implement ALPR system oversight.

Agency Comments

The four law enforcement agencies we reviewed responded to the draft audit report. Fresno responded that it will use the audit to work to achieve its goal of building trust in its community. Los Angeles responded that it respects individuals' privacy and believes it has policies in place to safeguard information. Nonetheless, it is working on an ALPR policy as required by state law and will perform periodic audits of users' searches. Marin stated it is committed to improvement and will consider the recommendations we made, although it disagreed with several of them. Sacramento stated that it had already begun implementing many of the recommendations, but that it did not agree with how we characterized some of the findings. Justice and the Sacramento County Department of Human Assistance also responded by acknowledging the draft report, although we did not have recommendations directed to either entity.

LOS ANGELES POLICE DEPARTMENT



MICHEL MOORE
Chief of Police

ERIC GARCETTI
Mayor

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Ref #: 1.1

February 4, 2020

Elaine Howle*
California State Auditor
621 Capitol Mall, Suite 1200
Sacramento, CA 95814

Dear Ms. Howle:

In response to your draft report titled "Automated License Plate Readers: To Better Protect Individuals' Privacy, Law Enforcement Must Increase Its Safeguards Over the Data It Collects," I would like to inform you that the Los Angeles Police Department (LAPD) has the utmost respect for individuals' privacy and currently has policies and procedures in place to safeguard personal information stored on the Automated License Plate Reader (ALPR) Systems. Personnel who utilize ALPR data have been through extensive training on accessing and using the data on a right to know and need to know basis. The LAPD continuously reviews all user accounts and deactivates accounts for separated employees, while allowing ALPR access to all active employees who have attended the training. ① ②

Although our dedication to protecting individuals' privacy is covered in our day to day operations and procedures, the Department is currently working on an ALPR policy to ensure that the protection of those rights is also memorialized in our Department Manual. The aforementioned ALPR policy will be completed by April 2020 and posted on the Department website once it is completed, as required by state law. The policy will address the types of information personnel may upload into the ALPR systems, as well as the retention period for the data or lists (i.e., hot lists used to link persons of interest with license plate images). The LAPD will perform an assessment of the systems' data security features and retention periods for ALPR images to evaluate the need for adjustment, prior to publishing of the ALPR policy. Furthermore, the policy will list the entities the Department shares ALPR images with and the process for handling image-sharing requests.

To ensure the ALPR policy is up to date and our ALPR systems are capturing proper information, the Department will perform periodic audits to assess the information the systems capture when accessed by the Department users. Per the recommendations listed in your audit draft report, the Department will have a plan that describes the periodic audits by February 2021 and will complete the first audit by June 2021.

Should you have any questions concerning this matter, please contact Sergeant Monica Tokoro, at (213) 486-0197.

Very truly yours,


MICHEL R. MOORE
Chief of Police

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www.LAPDOnline.org
www.joinLAPD.com

* California State Auditor's comments appear on page 61.

INTRADPARTMENTAL CORRESPONDENCE

September 30, 2021
1.8.2

TO: Commanding Officer, Audit Division

FROM: Commanding Officer, Innovation Management Division

SUBJECT: AUTOMATED LICENSE PLATE RECOGNITION AUDIT REPORT

Innovation Management Division (IMD) has reviewed the Automated License Plate Recognition Audit report. IMD is in agreement with the final audit report findings. An exit meeting will not be required.

If there are any questions regarding this matter, please contact Sergeant Armand Lemoyne serial no. 33253 (213) 486-5718.



TIMOTHY J. KALKUS, Captain
Commanding Officer
Innovation Management Division

ADDENDUM III