Memorandum

Tempe Police Department – Audit and Compliance Unit

TO: Director Brenda Buren, OMBR

FROM: Sergeant Karin Betz, Audit and Compliance Unit

DATE: April 8, 2015

SUBJECT: Automated License Plate Recognition Inspection

Between March 25th and April 1st, 2015 the Audit and Compliance Unit conducted an inspection of the Automated License Plate Recognition (ALPR) program. This is the second time an inspection has been performed on the ALPR program. The ACU reviewed the same areas of the program as the previous inspection which was conducted in August 2014 which included:

- Ensuring all users of ALPR equipment have completed departmental training.
- Retention of ALPR data is purged from the Department's APLR Server after six months.
- All ALPR queries by law enforcement include a corresponding case number or identification number.   `
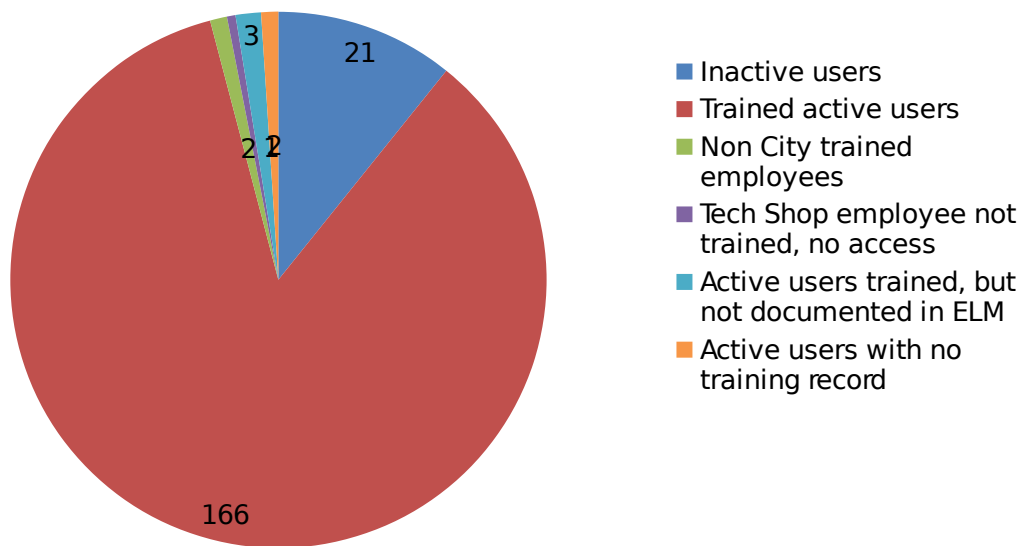
Completion of Departmental Training

According to the ALPR system there are 195 listed users of the system. This includes employees, vendor employees, and Police volunteers with both active and inactive accounts. Inactive accounts were created for employees by the system administrator due to interest expressed in attending a departmental training class, but the employee did not complete the training. Twenty two employees fell into this category.

Initially, seven users showed as active users with no documentation of completion of the departmental training. Follow up with ALPR administrators clarified this number and included two non-City employees who work with Tempe PD. Both of these employees have been trained as verified by viewing rosters, but the current system (ELM) utilized for documenting training does not allow for non-City employees to be entered into the system. One active user is a City employee who is required to have access to install the systems. He does not have training or any access to programs.   Two

other employees have attended training; however their training has not been submitted to be entered into ELM. There is no documentation of the other two employees receiving training. A final count of active users not documented in ELM as having departmental training documented is 4 out of 173 users or approximately 2.3%. The four users included the two employees said to be trained but not documented in ELM and the two employees with no training record. This percentage almost a 6% improvement over the 9% found to not have properly documented training from the previous audit.

ALPR documented users

Legend:
- Inactive users
- Trained active users
- Non City trained employees
- Tech Shop employee not trained, no access
- Active users trained, but not documented in ELM
- Active users with no training record

It should be noted the ALPR administrator instituted two recommendations from the previous audit:
 1. Including volunteers in ELM so training documentation could be verified
 2. Retired or terminated employees were completely removed from the system

Retention

The system is set to automatically purge every 180 days. Several queries were made in an attempt to access data past the 180 day retention period. No data obtained as a result of departmental ALPR equipment was retrievable past a six month time period.

Law enforcement purposes only use

General Order 17.102.D3e states a case number or identification number is required for each system query.

Records of departmental queries for the first three months of 2015 were conducted and evaluated to ensure compliance. The program limits queries to maximum of 500 on each report. Of the 1500 queries, follow up queries or reports requested from initial auditable queries do not require the user to input a case number or identification number, therefore, a total of 817 queries were evaluated for compliance.

Of the 817 auditable queries made during this time period, 120 (15%) did not have a proper case number submitted with the query. Instead, employees entered generic identifying information such as the type of crime being investigated or type of warrant. The majority (90) of the queries with improper information were the result of three employees, one of which was responsible for 61 of the queries. This employee works for a task force and is often asked to obtain information for other agencies. He was reminded to input the agency and detective's name requesting the information in the "requestor" box and to obtain a case number or warrant number if the query is not of an exigent matter. The other two employees were combined to include one unit in this instance due to the employees working relationship on the squad. These employees accounted for 29 improperly documented queries. Overall, performance in this area improved over 7% from the first inspection which showed a 22.6% non- compliance rate.

The previous audit recommended the ALPR administrator work with the vendor to include mandatory audit entries for more analytics than previously were included. This change has been implemented and a GO or identification number is now required for all queries except mapping or statistical data, however, queries for this follow the original query which requires the audited information.

Opportunities for improvement

1. ALPR administrators should ensure training records for all City employees (four) are documented in ELM and those employees (two) who do not have documented training receive applicable training or be inactivated.
2. Administration may want to consider inactivating employees' status if violations of policy continue after remedial training is provided. Internal audits may be helpful in monitoring employee behavior between ACU audits.