February 1, 2024

TO: House Judiciary Committee, Senate Judicial Proceedings Committee and Legislative Policy Committee

FROM: Agency Head

SUBJECT: License Plate Reader (LPR) Program required information per Public Safety Article § 3- 509

Maryland House Judiciary Committee:
The Honorable Luke H. Clippinger – Chair
The Honorable J. Sandy Bartlett – Vice-Chair
House Office Building, Room 101
6 Bladen Street, Annapolis, MD 21401

Maryland Senate Judicial Proceedings Committee:
The Honorable William C. Smith – Chair
The Honorable Jeffery D. Waldstreicher – Vice-Chair
Miller Senate Office Building, 2 East Wing
11 Bladen Street, Annapolis, MD 21401 - 1991

Maryland Legislative Policy Committee:
The Honorable Bill Ferguson- Co-Chair
The Honorable Adrienne A. Jones- Co-Chair
c/o Department of Legislative Services
Legislative Services Building, Room 200B, 90 State Circle, Annapolis, MD 21401

Honorable Chairmen and Chairwoman,

In accordance with § 2-1246 of the State Government Article, the Maryland Coordination and Analysis Center (MCAC) is reporting the following information regarding captured License Plate Reader (LPR) data for 2023:

1. **The total number of automatic license plate reader units being operated in the state by law enforcement agencies and submitting data to the center:**
   The Towson University Police Department has a total of:
   6 Fixed LPR sites (10 individual cameras)

2. **The number of automatic license plate reader readings made by a law enforcement agency that maintains an automatic license plate reader database and the number of readings submitted to the center:**
   The Towson University Police Department obtained 2,141,035 license plate Readings. Barring any technological issues, every reading was submitted to the Maryland Coordination and Analysis Center.

3. **The number of automatic license plate reader readings being retained on the automatic license plate reader database:**
   The Towson University Police Department submits all plate reader readings to the Maryland Coordination and Analysis Center and only maintains the past twenty four (24) hours of readings on its local automatic license plate reader database (Barring any technological issues). The number of readings in the database varies from day to day due to the fluctuating traffic patterns.
   No license plate readings from the calender year 2023 are being retained in the Local Towson University Police license plate reader database.

4. **The number of requests made to the (Insert Agency):**
   Note: Towson University Police does not accept requests from outside law Enforcement agencies for automatic plate reader data.

5. **The number of requests that resulted in a release of information:**
   Zero. There were no requests from another agency to access the Towson University Police database.

6. **The number of out of state requests:**
   Zero. There were no out of state requests to access the Towson University Police database.

7. **The number of federal requests:**
   Zero. There were no requests from another agency to access the Towson University Police database.

8. **The number of out of state requests that resulted in a release of information:**
   Zero. There were no requests from federal agencies to access the Towson University Police database.

9. **The number of federal requests that resulted in a release of information:**
   Zero. There were no requests from federal agencies that resulted in a release of information.

10. **Any data breaches or unauthorized uses of the automatic license plate reader database:**
    No. There were no known data breaches or unauthorized use of the automatic license plate reader database.

11. **A list of audits that were completed by the center or a law enforcement agency: (A Minimum required per MCAC Model Audit Policy is 50 if queries were done or all if less than 50)**
    The Towson University Police Department conducted an audit on the automatic license plate reader database for calendar years 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2022.

Members of the Towson University Police Department, for investigative or Administrative tasks, queried the Towson University Police "ELSAG" Enterprise Operations Center (EOC) database.

12. The Department of State Police and any law enforcement agency using an automatic license plate reader system shall adopt procedures relating to the operation and use of the system. The procedures shall include:

i. Which personnel in the Center or a law enforcement agency are authorized to query captured plate data gathered by an automatic license plate reader system: (Number of Persons)

Towson University Police General Directive 2.442.04 states:
"Investigations Unit Officers and Officers assigned to supervise the Communications Unit are the Only Employees who are allowed to:
1. Run investigative queries on locally collected, active LPR data; and
2. Manage (e.g. upload, modify, or remove) local listings.
Currently there are 2 users authorized to query the database

ii. An audit process to ensure that information obtained through the use of an automatic license plate reader system is used only for legitimate law enforcement purposes, including audits of requests made by individual law enforcement agencies or an individual law enforcement officer:

The Towson University Police Department's Communications Unit is charged with conducting and/or reviewing audits to ensure compliance with rules and regulations pertaining to the legitimate use of LPR data. The Towson University Police Department received the model policy for the Maryland Coordination and Analysis Center.

Respectfully Submitted,

Sgt. Shannon Cotton

Sgt. Shannon Cotton
Communications Unit Supervisor/Sergeant
Towson University Police Department

Goal	Question	Answer (Yes or No)	Comments
1	Have procedures been adopted related to the operation and use of the LPR System? (Cite policy number)	YES	2.442 License Plate Recognition Program Comm. 09.02 License Plate Recognition System PS 02.14 Local LPR Listings
2	Are staff with access to Automatic License Plate Reader database adequately screen and trained in the proper use of the system and all the privacy policies related to thereto?	YES	All agency personnel who have access have undergone background checks and advised of privacy and confidentiality requirements.
3	Does the agency maintain training records for each user?	YES	Yes, via Power DMS
4	Is the training curriculum maintained?	YES	Office of Professional Standards
5	Are the training records reviewed for relevance and effectiveness?	YES	Office of Professional Standards
6	Does the agency accept law enforcement request for license plate captured data collected by and LPR system?	NO	The agency does not accept requests from outside LE agencies. Outside LE agencies are referred to MCAC for data.
7	If historical data is accessed, does the agency have an audit trail?	YES	Data kept only for 24 hour period before being sent to MCAC and cleared. Any queries during that time require purpose information through the Enterprise Operation Center.
8	Is the audit trail maintained for at least 3 years?	YES	2015,2016,2017,2018,2019, 2020,2021,2022 and current 2023

9	Have audit procedures been adopted to ensure that information obtained through the use of an LPR system is used only for legitimate law enforcement purposes?	YES	Enterprise Operation Center requires purpose information for each query. The Towson University Police Communications Unit is tasked with ensuring the proper use of the LPR system.
Agency:	Towson University Police Department	Scope of Audit:	2,141,035 records
Completed By:	Sgt. Shannon Cotton #397	Date Completed:	2/8/2024
Reviewed By:	Capt. Woodrow Myers#400	Date Completed:	2/29/2024

Audit Record Number	Question # 1 Agency Case #	Question # 2 Is the date and time of request documented?	Question # 3 Is the purpose of the request documented?	Question # 4 Does the request include the identity of the agency requesting the query?	Question # 5 Has the request been validated through the requesters agency?	Results: Findings shall be listed as: Accurate, Inaccurate, Unable to locate or Incomplete
1	CCN#100-11-5399	YES	YES	YES	YES	ACCURATE
2	CAD#23-04-26-009696	YES	YES	YES	YES	ACCURATE
3	CAD#23-04-26-009696	YES	YES	YES	YES	ACCURATE
4	CAD#23-04-26-009696	YES	YES	YES	YES	ACCURATE
5	CAD#23-04-26-009696	YES	YES	YES	YES	ACCURATE
6	CCN#22-00367	YES	YES	YES	YES	ACCURATE
7	CAD#21-04-16-013236	YES	YES	YES	YES	ACCURATE
8	CAD#21-04-16-013236	YES	YES	YES	YES	ACCURATE
9	CAD#21-04-16-013236	YES	YES	YES	YES	ACCURATE
10	CCN#21-00072	YES	YES	YES	YES	ACCURATE
11	CCN#23-00613	YES	YES	YES	YES	ACCURATE
12	CCN#23-243-2031	YES	YES	YES	YES	ACCURATE
13	CCN#23-243-2031	YES	YES	YES	YES	ACCURATE
14	CCN#23-00613	YES	YES	YES	YES	ACCURATE
15	CAD#23-04-26-009696	YES	YES	YES	YES	ACCURATE
16	CCN#23-00980	YES	YES	YES	YES	ACCURATE
17	CCN#23-00980	YES	YES	YES	YES	ACCURATE
18	CCN#23-01034	YES	YES	YES	YES	ACCURATE
19	CAD#23-04-26-009696	YES	YES	YES	YES	ACCURATE

Submitting Agency:	Towson University Police Department
Scope of Audit	01/01/2023 through 12/31/2023
Prepared By:	Sgt. Shannon Cotton Communications Unit Supervisor
Date Prepared:	2/29/2024

Reviewing Agency:	Towson University Police Department
Reviewed By:	Capt. Woodrow Myers Operation Support Bureau Commander
Date Reviewed:	2/29/2024
Signature	