Spokane Colleges Administrative Procedure
5.30.05-K Automated License Plate Reader (ALPR) Systems

Implementing Board Policy 5.30.05
Contact: Chief General Services Officer 509-533-4878

1.0 Purpose

This procedure establishes requirements for the use of Automated License Plate Reader (ALPR) systems by Spokane Colleges. Spokane Colleges' ALPR program is designed to support parking enforcement functions while ensuring compliance with state law.

2.0 Scope - Limitations and Requirements

This procedure applies to all personnel who access, operate, administer, maintain, or receive data from Spokane Colleges' ALPR cameras used for parking enforcement. This procedure implements the requirements of the Washington State Driver Privacy Law, Chapter 239, Laws of 2026 (SB 6002)

3.0 Definitions

3.1 Automated License Plate Reader (ALPR) System: A system, software, or computer algorithm used to convert images of license plates into computer-readable data, whether used independently or in combination with one or more mobile or fixed automated cameras.

3.1.1 For purposes of this procedure, ALPR does not include camera systems excluded by law unless they interface or interact with an ALPR system for an authorized purpose.

3.2 ALPR Data: All data collected by the ALPR system, including (but not limited to) license plate number, photograph, location, date and time, GPS coordinates, and vehicle characteristics.

3.3 Audit Trail Data: Data collected or generated by the ALPR system that identifies how the system is accessed or used, including who accessed it, and how and when the system was accessed or used.

3.4 Parking Enforcement Case: A parking citation, warning, notice of violation, or related administrative action that may be issued and adjudicated under Spokane Colleges' parking rules and procedures.

3.5 Final Disposition (Parking Case): The point at which a parking enforcement case is closed, including completion of adjudication, exhaustion of all applicable appeals processes, expiration of the time to appeal, or full payment of a citation and all associated administrative fees such as a boot fee or DOL fees.

4.0 Governance and Responsibilities

4.1 Agency Head Certification and Registration

4.1.1 The Spokane Colleges Chancellor (or designee) is responsible for ensuring the registration of all Spokane Colleges ALPR systems with the Washington State Office of the Attorney General, certifying that Spokane Colleges ALPR systems meet legal requirements, and ensuring documented training is in place for all authorized users.

4.1.2 Spokane Colleges shall not use any ALPR system that is not properly registered with the Attorney General's Office.

4.2 **System Administrator**

Spokane Colleges Chief General Services Officer or their designee is the ALPR System Administrator and is responsible for governance, compliance, audits, reporting, procedure maintenance, and ensuring retention/purge requirements are met across all ALPR and parking management integrated systems.

4.3 **Program Owner**

The District Director of Security assigned the responsibility of administering the Spokane Colleges Parking Program by the Chief General Services Officer serves as Program Owner. The assigned District Director of Security is responsible for day-to-day account provisioning, permissions, retention configuration, vendor coordination, integration controls (including with the Parking Management System Contractor), and security controls.

4.4 **Authorized Users**

4.4.1 Access to ALPR systems and data is granted based on job duties and limited to the minimum necessary permissions. Administrative roles are limited to the necessary designated staff approved by the District Director of Security who has primary administrative oversight of the Spokane Colleges parking program.

4.4.2 Only trained personnel, approved by a supervisor and with a legitimate operational need are authorized to use ALPR systems and access ALPR data. These determinations are subject to the approval of the System Administrator.

4.4.3 All authorized users shall receive training on permissible use of ALPR systems and data. All completed training shall be documented by a supervisor. All training records shall be provided to and maintained by the Program Owner.

4.4.4 A comprehensive training program shall be developed and maintained by the Program Owner, subject to the approval of the System Administrator.

4.4.5 Each user must have a unique account and may not share credentials. See section 9.1.

5.0 Authorized Uses

5.1 Any willful or intentional misuse of ALPR systems or data may result in criminal penalties, civil liability, and institutional discipline.

5.2 Spokane Colleges is not a law enforcement agency, and ALPR systems shall not be used for criminal investigation, intelligence gathering, or any other law-enforcement purpose except as expressly authorized by law.

5.3 ALPR data may only be used for the following authorized purposes:

5.3.1 Consistent with chapter WAC 132Q-20 and applicable Spokane Colleges procedures, enforcing restrictions on the use of parking spaces (e.g., permit validation, time-limit enforcement, zone restrictions, reserved spaces, paid parking compliance, and resident/visitor designations).

6.0 Prohibited Uses and Practices

6.1 The following uses and practices are prohibited:

6.1.1 Using ALPR systems or data for immigration investigation or enforcement, in accordance with RCW 10.93.160, or for any protected health care services under chapter 7.115 RCW, or to track or otherwise monitor activity protected by the

Washington state Constitution and the first amendment to the United States Constitution

6.1.2 Collecting ALPR data on the premises or immediate surroundings or access to or from facilities that provide protected health care services, as described in chapter 7.115 RCW, or at facilities conducting an immigration matter as defined in RCW 19.154.020, elementary and secondary schools, places of worship, courts, or food banks.

6.1.3 Selling, leasing, renting, or purchasing ALPR data or audit trail data.

6.1.4 Providing any unauthorized entity with direct access to the ALPR system.

6.1.5 Disclosing, sharing, or permitting access to ALPR data except as required in a judicial proceeding and managed through authorized channels.

6.1.6 Collecting ALPR data at prohibited sensitive facility locations as described in this procedure and as required by law.

6.1.7 ALPR systems shall not be used for generalized surveillance, student conduct monitoring unrelated to parking enforcement, employee performance monitoring, intelligence gathering, or any purpose not expressly listed in this procedure and authorized by law.

7.0 System Operations

7.1 Fixed ALPR cameras are not authorized.

7.2 Mobile ALPR may be used during parking enforcement to efficiently identify vehicles violating parking restrictions, subject to location restrictions and user training requirements.

7.3 ALPR results must be verified by an authorized parking enforcement officer before issuing a citation, immobilizing, or initiating an impound. Verification includes visually confirming the plate and vehicle context and confirming the applicable rule/permit status in the parking management system.

8.0 Data Retention, Deletion, and Preservation

8.1 Parking Enforcement Retention Rule

8.1.1 Review and Verification: All ALPR parking violation detections (“hits”) shall be reviewed by designated parking enforcement personnel to:

8.1.1.1 Verify the accuracy of the captured license plate information; and

8.1.1.2 Determine whether a parking violation has occurred.

8.1.2 Case Entry and Data Minimization: Upon verification of a parking enforcement action:

8.1.2.1 Designated parking enforcement personnel shall manually enter only the confirmed license plate number of the relevant vehicle into the (separate) parking enforcement system software; and

8.1.2.2 No additional ALPR data shall be retained, accessed, or used for parking enforcement purposes.

8.1.3 Retention: Spokane Colleges shall ensure ALPR data is not retained for longer than 21 days. When retained for the purpose of parking enforcement, however, ALPR data may be retained provided the data is deleted no later than 12 hours after final disposition of a parking enforcement case, including any applicable appeals process.

8.1.4 Automated Data Purge: Spokane Colleges will work with its ALPR vendor to implement a vendor automated purge process, or equivalent technical control to ensure that all ALPR data retention requirements are met as provided by law.

8.1.4.1 All ALPR data not needed to initiate a parking enforcement case should be automatically deleted as soon as possible.

8.1.5 Audit and Logging: System-generated logs documenting ALPR data deletion and purge actions shall be maintained and made available for routine internal audit, compliance review, and verification purposes.

8.2 If a valid legal preservation directive is received before a purge occurs, the Program Owner will coordinate to preserve data as required by law. If the data has already been purged under routine retention rules, Spokane Colleges will document that fact.

9.0 Access Controls, Security, and Data Management

9.1 Authentication and Account Management

9.1.1 Unique user accounts are required for all personnel. Personnel shall not allow others to use their unique account credentials.

9.1.2 Password and multi-factor authentication requirements shall follow institutional identity and access management standards.

9.1.3 Supervisors must ensure accounts are promptly disabled upon separation, reassignment, or lapse in required training.

9.2 Data Security

9.2.1 ALPR data must be encrypted.

9.2.2 ALPR data and audit logs must be stored in systems approved by institutional IT/security governance.

9.2.3 Exports/downloads must be minimized; where necessary, exports must be secured and tracked as part of audit trail data.

10.0 Data Sharing, Disclosure, and Public Records

10.1 ALPR data may not be disclosed, shared, or accessed by external entities except as required in a judicial proceeding or as necessary for vendor support as specified below. Direct access may not be provided to unauthorized entities.

10.2 ALPR data is not subject to disclosure under the Public Records Act (Chapter 42.56. RCW). Requests for ALPR data must be routed through the institution's public records and compliance office to ensure appropriate handling and statutory compliance.

11.0 Vendor Management and Contract Requirements

11.1 All ALPR vendor agreements must include requirements that:

11.1.1 Reflect that Spokane Colleges is the legal owner of all ALPR data collected by systems it operates or causes to be operated on its behalf.

11.1.2 Prevent unauthorized data sharing, secondary transfer, or access by unauthorized agencies/entities.

11.1.3 Default all sharing settings to “no sharing” and require explicit institutional consent for any sharing-permission changes.

11.1.4 Prohibit the vendor from selling, leasing, renting, or otherwise allowing access to ALPR data to unauthorized parties.

11.1.5 Require vendor access only to the extent necessary to fulfill a specific institution-authorized purpose.

11.1.6 Require vendor-provided audit trail logs to be made available and retained by the institution.

11.1.7 Prohibit vendor from making system changes or updates affecting the permissions of ALPR data without prior written approval from Spokane Colleges.

12.0 Audit Trail Data and Logging

12.1 Spokane Colleges will maintain ALPR audit trail data for a minimum of two years. Audit trail data must include:

12.1.1 Identity/username of the person accessing/querying the system and affiliated organization (as applicable).

12.1.2 Date and time of access/query.

12.1.3 Data elements used to query the system.

12.1.4 Specific purpose for the query/access (parking enforcement purpose category).

12.1.5 Associated citation/case number (or equivalent reference).

12.1.6 Location of cameras involved in the access/query.

12.1.7 Records of exports/downloads/sharing, including vendor-provided audit logs.

12.2 Audit query elements are used solely for auditing and may not be searched, analyzed, compiled, or indexed for investigative purposes.

13.0 Internal Audits and Compliance Monitoring

13.1 At least annually, the Program Owner will conduct an internal audit to review:

13.1.1 All access and use reflected in audit trail data for compliance and authorized purpose.

13.1.2 Compliance with retention/deletion requirements, including purge of all ALPR data as required by law and this policy.

13.1.3 Compliance with sharing restrictions and vendor contract controls.

13.1.4 Effectiveness of sensitive location controls.

13.2 Audit findings will be documented, corrective actions assigned, and follow-up reviews conducted to confirm any necessary or appropriate remediation.

14.0 Training Requirements

14.1 All authorized users and administrators must complete initial training prior to receiving access, and refresher training at least annually. Training must cover:

14.1.1 Authorized uses and prohibited uses.

14.1.2 Sensitive facility location restrictions and operational avoidance procedures.

14.1.3 Spokane Colleges' ALPR data purge practice following verification and case creation in the separate parking enforcement software;

14.1.4 Access controls, account security, and audit trail obligations.

14.1.5 Vendor limitations and restrictions on sharing.

14.1.6 Consequences for misuse, including criminal and civil liability and institutional discipline.

15.0 Transparency, Reporting, and Public Awareness

15.1 The institution will publish this procedure on its public website and maintain a current link for submission to the Office of the Attorney General as required by law.

15.2 The institution will prepare and publish an annual report describing ALPR system practices and usage. The report will include, at minimum:

15.2.1 Total annual number of ALPR reads, searches that yielded results, and alerts.

15.2.2 Locations of cameras and general descriptions of mobile deployment areas.

15.2.3 Number of preservation requests and disclosure orders received (if any).

15.2.4 Number of times ALPR data or audit trail data was shared with or accessed by another governmental entity and the identity of each such entity (if any).

15.2.5 Number of times ALPR data was accessed/shared pursuant to a judicial warrant/order (if any).

15.2.6 Results of the annual internal audit and any material procedure changes affecting collection, retention, access, or sharing.

16.0 Procedure Maintenance and Change Control

16.1 Procedure changes will follow the provisions of AP 1.40.01-B. Where required by law, notice of procedure modification or repeal will be submitted to the Office of the Attorney General within statutory deadlines.

16.2 Spokane Colleges will review this procedure as Attorney General model policies, guidance, and related legal interpretations become available.

17.0 Misuse, Discipline, and Incident Response

17.1 Misuse of ALPR systems or data is prohibited and may result in discipline up to and including termination, loss of vendor access, and/or referral for criminal investigation, and civil liability exposure. Suspected incidents will be managed under the institution's incident response process, including:

17.1.1 Immediate containment (account lock, access suspension, preservation of logs).

17.1.2 Notification to Program Owner, IT/security, and appointing authority.

17.1.3 Internal investigation and documentation.

17.1.4 Remediation and retraining as appropriate.

17.1.5 Required external notifications, if any.

18.0 Related Items

18.1 Senate Bill 6002

18.2 WAC 132Q-20

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