

Oakland County Sheriff's Office
General Order # 4.11



SUBJECT: License Plate Reader (LPR) System		NUMBER: 4.11
EFFECTIVE DATE: 8/24/2026 REVIEW DATE: Annually	MACP Standard Impact: 4.1.3	
REPLACES AND RESCINDS: G.O. 4.11 dated 6/22/2026	DISTRIBUTION: A, I	NUMBER OF PAGES: 3

This order replaces and rescinds all previously issued orders, procedures, rules and regulations, notices and/or practices in conflict with this General Order.

I. PURPOSE

The purpose of this order is to establish an operating procedure to serve as a basis for the use of the License Plate Reader (LPR) system by members of the Oakland County Sheriff's Office (OCSO), consistent with applicable law, constitutional protections, and nationally recognized law enforcement best practices.

II. POLICY

It shall be the policy of the Oakland County Sheriff's Office to provide guidelines for agency personnel for the use, access, retention, sharing, and oversight of the LPR system and associated data, and to ensure that LPR technology is deployed in a manner that respects individual privacy interests and civil liberties while supporting legitimate public safety objectives.

III. DEFINITIONS

- A. **ADMINISTRATOR**: The Technology, Information, and Innovation Captain, who serves as Administrator for LPR system deployment.
- B. **Call For Service (CFS)**: The CFS number refers to the agency's incident number assigned by Computer-Aided Dispatch (CAD) System and is the Case Report (CR) number, when a case report is generated from a CFS.
- C. **EVIDENTIARY PRESERVATION HOLD**: A documented request to preserve specific LPR data beyond the standard retention period because the data is relevant to an active criminal investigation.
- D. **HISTORICAL LPR DATA**: LPR Data stored for future use, including reads not associated with a hot list hit.
- E. **HOT LIST**: An electronic database containing license plate numbers of vehicles of interest (e.g., the vehicle is stolen, owned by a wanted person, related to an Amber Alert, or missing/endangered person). (**MACP Standards 4.1.3d**)
- F. **HIT**: A positive indication by visual and/or audible signal of a potential match between data on a 'hot list' and a license plate scanned by an LPR system.

Oakland County Sheriff's Office
General Order # 4.11

- G. **LPR DATA**: Information generated by the LPR system, including but not limited to LPR images, license plate reads, associated metadata (date, time, location), and hot list notifications.
- H. **LPR SYSTEM**: The LPR units, network components, and the vendor-hosted (cloud) platform and software, including OCR and associated algorithms, operating together to collect license plate information and generate hot list notifications.
- I. **OFFENSE-BASED ACCESS RESTRICTION**: A configuration, supported by the LPR system, that limits the categories of offenses for which another agency may search OCSO LPR data, or for which OCSO may search another agency's data.
- J. **PRIVACY OFFICER**: The member designated by the Sheriff's Office to conduct periodic compliance audits of the LPR system.
- K. **READ**: A digital image of a license plate and vehicle, and the associated metadata, captured by an LPR unit.
- L. **USER**: A member who has been trained and authorized to access the LPR system.

IV. PROCEDURE

A. GENERAL

1. LPR systems are used to enhance law enforcement and investigative capabilities and increase public and officer safety.
 - a. LPR systems must be properly deployed and carefully managed to ensure effective operations that recognize and respect a person's privacy interests, civil rights, and civil liberties.
2. Prohibited uses of the LPR systems include:
 - a. Sheriff's Office personnel are **prohibited** from using the LPR system or associated data, including *Hot Lists* solely because of a person's or group's race, gender, religion, political affiliation, nationality, ethnicity, sexual orientation, disability, or other classification protected by law.
 - b. The use of LPR systems to harass and/or intimidate any individual or group is **prohibited**.
 - c. Except when done pursuant to a court order, capturing license plates with the LPR system that are not exposed to public view is **prohibited**.
 - d. The use of the LPR system or associated scan files or hot lists for any personal purpose is **prohibited**.
 - e. The use of the LPR system or associated scan files or hot lists for the purpose of identifying any individual or group engaged in the exercise of First Amendment Rights is **prohibited**.
 - f. Initiating or requesting an enforcement stop based solely on an LPR alert associated with a civil immigration violation is **prohibited**.
3. LPR Data may be accessed and used only for the following purposes:
 - a. To alert members to the proximity of a vehicle displaying a license plate number included on a hot list.

Oakland County Sheriff's Office
General Order # 4.11

- b. To locate a vehicle displaying a license plate related to an individual who is suspected of having committed a crime.
 - c. To assist in the investigation of a specific criminal offense.
 - d. To assist in locating a missing or endangered person.
- 4. LPR systems, including all equipment, databases and data, are property of the OCSO and shall be used for official OCSO criminal justice purposes only. (**MACP Standards 4.1.3a**)
- 5. An LPR system's local database shall be updated at a frequency that ensures the most current LEIN and NCIC extract received from the Michigan State Police is being used.
- 6. An LPR alert or hit is an investigative lead only. It shall never, by itself, serve as the sole basis for an enforcement stop or other law enforcement action. 'Hits' must be confirmed active through LEIN and/or NCIC.
 - a. Confirmation must occur before stopping the vehicle unless there is a separate legal basis to make the stop (e.g., traffic infraction observed).
 - b. If there is a separate legal basis to make the stop, then confirmation may occur during the stop.
- 7. LPR equipment shall be deployed and used to capture vehicles and license plates exposed to public view.

B. ADMINISTRATION

- 1. The Technology, Information, and Innovation Captain will act as Administrator for LPR system deployment and use.
- 2. The Administrator is responsible for the following:
 - a. Establishing protocols for access, collection, storage, and retention of LPR data and associated media files. (**MACP Standards 4.1.3d**)
 - b. Establishing protocols to preserve and document LPR reads and "hits" that are acted upon in the field or associated with investigations or prosecutions. (**MACP Standards 4.1.3d**)
 - c. Establishing protocols to ensure the security and integrity of data captured, stored, and retained by the LPR system, including a requirement that multi-factor authentication (MFA) be used for all LPR system credentials. (**MACP Standards 4.1.3d,e**)
 - d. Ensuring the proper selection and training of the personnel approved to use the LPR system and maintaining an adequate number of trainees. (**MACP Standards 4.1.3b,c**)
 - e. Maintaining records identifying LPR system non-traditional deployments (e.g., special operations or during an investigation) and the results, including appropriate documentation of significant incidents and arrests which occur as a result of LPR system usage. (**MACP Standards 4.1.3d**)
 - f. Authorizing requests for LPR system use or data access according to the general orders and guidelines of OCSO, including any offense-based access restrictions established within this general order. (**MACP Standards 4.1.3c**)

Oakland County Sheriff's Office
General Order # 4.11

- g. Ensure designated, trained personnel check the equipment on a regular basis to ensure functionality and camera alignment. Any equipment that does not meet expected functionality shall be removed from service until deficiencies have been corrected. (**MACP Standards 4.1.3b**)
 - h. Ensure LPR system repairs and maintenance, including the installation of any hardware or software updates, are timely performed by agency-authorized sources.
 - i. Ensure that a member's LPR system credentials are promptly deactivated upon separation, transfer, or loss of operational need for access, and periodically reviewing active user accounts to confirm continued need.
 - j. Confirm that the LPR platform's technical retention configuration is set to, and remains consistent with, the seven (7) day period established in this order and periodically re-verifying this configuration.
- 3. Internal auditing with the LPR system shall be performed every month by the Sheriff's Office Privacy Officer to ensure compliance with this order, including a review of associated CFS compliance, exigent-circumstance searches, active sharing partners and offense-based access restrictions established in this order, and any anomaly or account-suspension activity generated from this order.
 - a. Corrective action shall be taken by the division commander after determining the intent and degree of negligence in the compliance error found, recommending appropriate discipline and remedial training.

C. LICENSE PLATE READER SYSTEM USAGE

- 1. LPR system use and access to LPR data shall be for official agency purposes only. (**MACP Standards 4.1.3a**)
- 2. Only deputies who have been properly trained in using the LPR system, and authorized to do so, may use it. (**MACP Standards 4.1.3b,c**)
- 3. At the start of each shift, users must ensure the LPR system has been updated with the most current "hot list" available, following the user instructions.
- 4. Every search of the LPR system, including hot list configuration, shall include a CFS as the reason for the search.
 - a. If the search relates to an existing case or incident, the reason for the search shall be documented within the relevant case report narrative or in a supplemental report to the existing CFS.
 - b. If the search does not relate to an existing CFS, the user shall pull a CFS Number specifically for that search, and author a case report.
 - c. The documented reason must articulate a specific and valid investigative basis for the search (e.g., "robbery investigation," "homicide suspect vehicle," "missing person").
 - i. A vague, generic, or non-specific description, including a reference to a traffic stop or routine patrol, does not satisfy this requirement.
 - ii. This standard is evaluated based on the information reasonably known to the member at the time of the search, not on facts later developed or confirmed.

Oakland County Sheriff's Office
General Order # 4.11

- d. This reason must also be entered into the LPR system's own search reason field at the time of the query and shall match the reason documented in the case report.
5. When alerted of an LPR system 'hit', but before initiating a stop, users shall:
 - a. Visually verify that the vehicle plate number matches the plate number run by the LPR system, including both alphanumeric characters of the license plate and the state of issuance.
 - b. Verify the current status of the plate through Dispatch or MDC query.
6. The user shall record the disposition of a 'hit' into the LPR system interface included in the software. All records will be purged after seven (7) days and will be audited by the Privacy Officer every month.
 - a. LPR hits shall not be cross-checked to obtain ownership information except for legitimate and officially sanctioned law enforcement investigations. **(MACP Standards 4.1.3a)**
7. 'Hot Lists' may be updated manually if the user enters a specific plate into the LPR system and wants to be alerted when that plate is located. The user must document the reason for the manual entry in the case report.
8. LPR system use during non-traditional deployments (e.g., special operations or during a non-criminal investigation) must be approved in advance by the Administrator or designee. **(MACP Standards 4.1.3c)**
9. Searches of historical and non-hit data within the LPR system shall be done only with approval by the Administrator. **(MACP Standards 4.1.3c)**
 - a. Types of searches which may be allowed to be conducted by the Administrator include special operations including when there is imminent danger to life. Searches may also be used when conducting a felony investigation or during felony apprehension efforts for those with valid warrants for their arrest.

D. LPR DATA SHARING AND DISSEMINATION

1. LPR data is For Official Use Only (FOUO) and may be shared only for legitimate law enforcement purposes. Information sharing must be done in accordance with established Sheriff Office General Orders. An agency that would like to view OCSO LPR data must request access, which may be granted or denied by the Administrator. **(MACP Standards 4.1.3a,c)**
2. When LPR data is disseminated outside the OCSO, documentation must be made in a secondary dissemination log, and this is maintained by the Administrator. **(MACP Standards 4.1.3d)**

E. RETENTION

1. License plates numbers that are run by the LPR system will be kept in the OCSO LPR system for seven (7) days. After seven (7) days, all records will be auto purged from the system. **(MACP Standards 4.1.3d, e)**
 - a. Any information that needs to be saved for case reports or prosecution will only be saved in the authorized and official digital media evidence repository.

Oakland County Sheriff's Office
General Order # 4.11

2. No Personally Identifiable Information (PII) is stored in the database. Only the license plate number and the make/model of a vehicle (and related vehicle identifiers) may be retained in the LPR System and automatically purged in seven (7) days. (**MACP Standards 4.1.3e**)
3. Manually entered license plate numbers shall be removed immediately as they are no longer relevant for investigatory purposes. (**MACP Standards 4.1.3e**)

F. ACCOUNTABILITY, AUDITING, AND SECURITY

1. Members shall complete training before accessing, maintaining, analyzing, or otherwise using LPR data, covering, at minimum:
 - a. The requirements of this order and the importance of complying with its terms.
 - b. The types of errors LPR recognition software can make when converting an LPR image into a license plate read.
 - c. LPR data relates to a vehicle's license plate and whereabouts, and not necessarily the whereabouts or identity of the vehicle's registered owner or driver.
 - d. A license plate number is not a proxy for an individual's name or other personally identifying information.
2. Use of the LPR system is limited to members who have completed the training described above and can provide documentation of having done so. The Administrator shall maintain records confirming completion of this training.
3. Where supported by the LPR platform, user accounts meeting defined criteria for abnormal or potentially unauthorized activity may be automatically suspended pending Administrator review.
4. All LPR system credentials require multi-factor authentication (MFA).
5. The Administrator, in coordination with the Privacy Officer, shall monitor relevant legislative and regulatory developments affecting LPR systems and recommend updates to this order as needed.

G. TRANSPARENCY

1. The OCSO shall provide this general order to the public via the OCSO Website.

H. DATA OWNERSHIP

1. All LPR data captured through an LPR system deployed or subscribed to by the OCSO is the property of the OCSO.
2. The OCSO retains sole authority over decisions regarding access to, and sharing of, its LPR data, subject to this order and applicable law.
3. Any agreement between the OCSO and a third-party LPR vendor shall affirm, in writing, the OCSO's ownership of its LPR data and its authority to direct the vendor's retention, access, and sharing practices consistent with this order.

I. COMPLIANCE

1. All Sheriff's Office personnel shall abide by this general order set forth herein when using LPR systems.

Oakland County Sheriff's Office
General Order # 4.11

2. Any member who misuses the LPR system, associated equipment, databases, or data may be subject to:
 - a. Criminal prosecution.
 - b. Civil liability.
 - c. Administrative sanction, up to and including termination, consistent with applicable collective bargaining agreements and OCSO policy.



ISSUED BY: Sheriff Michael J. Bouchard