



MAINE STATE POLICE MAINE INFORMATION & ANALYSIS CENTER

MIAC Privacy Audit Process Policy

The purpose of this policy is to establish the process the MIAC will follow when conducting privacy audits, which are intended to help to continually improve the Center's compliance with the MIAC Privacy Policy.

The following process shall be followed when MIAC privacy audits are conducted:

1. The MIAC Director, the MIAC Compliance Officer, the MIAC Privacy Officer, the Public Member of the MIAC Advisory Board, and a Member of the Board selected by the Board's Chair (the "Audit Team") shall conduct the privacy audit. If the Public Member of the Board cannot participate in an audit, then the Chair shall select another Member of the Board to participate.
2. The MIAC Director shall determine the timeframe for which the privacy audit will account. The MIAC Director or at his designation the MIAC Compliance Officer is responsible for helping to coordinate, direct and facilitate the audit process.
3. To avoid any actual or perceived selection bias during the audit process, MIAC will pick activity entries at random. Using the "Research Randomizer" website (www.randomizer.org), a random sample of three percent (3%) of the total MIAC Activity Report entries ("AR entries") for the timeframe specified. MIAC shall also review all submissions to the E-Guardian system during the timeframe. In addition, both Board Members participating in the privacy audit each shall select five (5) random AR entries to be audited from the range of AR entry report numbers that are used to generate the random sample.

4. The AR entries to be audited shall be disseminated to the Audit Team as far in advance as is practicable prior to the date of the privacy audit so they can review these documents and records before the actual audit meeting.
5. The MIAC Compliance Officer or their designee shall prepare a summary of each AR entry that will be reviewed during the privacy audit. The summaries of the respective AR entries that are prepared by the MIAC Compliance Officer shall be forwarded to the MIAC Privacy Officer for later inclusion in the MIAC evaluation forms described in section 6. The content summary should be a *de-identified information regarding each activity report that can lawfully be disseminated publicly in the interest of promoting transparency and clarity on MIAC's activities.*
6. A MIAC-designed evaluation form based on the Department of Homeland Security Privacy, Civil Rights, and Civil Liberties (P/CRCL) Audit Guidance for the State, Local, Tribal, and Territorial Intelligence Component product, shall be used to audit each MIAC Activity Report entry, including all attachments to each entry.
7. The Audit Team shall meet to conduct the audit, either in person or virtually using remote meeting applications.
8. During the audit process, members of the audit team are encouraged to engage in constructive discussions regarding MIAC's activities with respect to privacy, civil rights and civil liberties. Members of the audit team are also encouraged and expected to identify any activities, operations or practices which arise during the audit that should be brought forward to the MIAC Advisory Board for additional discussion and consideration.
9. Once the Audit Team has completed the privacy audit, the evaluation forms shall be finalized by the MIAC Privacy Officer. The Privacy Officer shall include in the appropriate AR entry evaluations forms the AR report entry summaries prepared by the MIAC Compliance Officer.
10. The MIAC Privacy Officer shall prepare a report of the Audit Team's key findings.
11. The audit report is not considered complete until it has been presented to the MIAC Advisory Board.
12. The privacy audit report then shall be presented to the full Advisory Board at its next-scheduled meeting.