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Date January 24, 2025

To: Marissa Madrigal, Chief Operating Officer
Andrew Scott, Deputy COO
Craig Stroud, Interim General Manager of Visitor Venues
Rachel Tull, Chief Information Officer

From: Brian Evans, Metro Auditor

RE: Early Communication – Surveillance Camera Controls

Summary

Inconsistent language in surveillance camera policies increased the risk of noncompliance with Metro’s records retention schedule. Two of the policies we reviewed contained language that indicated footage could be destroyed before the 30 days required by the retention schedule. This could result in noncompliance with Metro policy and Oregon law.

There were also other control weaknesses that indicated issues with effective governance and management of surveillance camera use. Some camera sites did not appear to be aware of policies. Several sites use Metro’s agency-wide policy as their designated policy, but that policy was in draft-form and not approved. The Camera Governance Group that was expected to address recommendations in our 2019 audit did not appear to be functioning. There was also a risk that Metro’s camera system contractor may not support the current version in the future which may require planning and investment to maintain.

Inconsistent policy statements related to retention increase risk of early destruction

Based on the policies reviewed for the Information Technology and Records Management (IT) audit, at least two facilities may be out of compliance with Metro’s records retention schedule. The Oregon Convention Center’s (OCC) and Portland Expo Center’s (Expo) policy contained language stating that recording would be retained “no less than 10 days and no longer than 30 days.” This could be interpreted to mean a record between 11 to 29 days old could be destroyed. This would conflict with Metro’s Records Retention schedule which states the retention as “30 days after recording.”

Another area of inconsistency was in the Zoo retention guidance, which stated recordings be retained for a minimum of 30-days. Here the guidance was less clear about when to start counting the 30-days. Conceivably, one could count the day of recording, resulting in footage being destroyed one day sooner than permitted in the records retention schedule. Updating policies to reflect Metro’s retention guidance “30 days after recording” could ensure footage is retained as required.

Three sites - Waste Prevention and Environmental Services, Parks and Nature, and Portland’s Center for Performing Arts – did not have site-specific camera policies. This could mean they use the draft Metro-wide Camera Policy, which has not been approved. The camera site owner at the Metro Regional Center (MRC) provided a page out of their Standard Operating Procedure, which did not contain guidance on the retention period. Management stated that each site had the option to use the Metro-wide policy or develop their own.

Exhibit 1: Some camera policies did not align with Metro’s Records Retention Schedule

Metro’s Retention Schedule	Draft Metro-wide Camera Policy	OCC Camera Policy	Expo Camera Policy	Draft Zoo Camera Policy	MRC Video Management SOP
30 days after recording	in accordance with the records retention policies of the State of Oregon and Metro policy	minimum of 10-days and maximum of 30-days	minimum of 10-days and maximum of 30-days	minimum of 30 days	silent
Conclusion	Adequate	Needs Improvement	Needs Improvement	Needs Improvement	Needs Attention

Source: Auditor review of policy statements for Metro-wide, OCC, Expo, Zoo, and Metro Regional Center (MRC). Auditor generated conclusions: Adequate = aligns with retention schedule; Needs Improvement = some retention guidance but needs better alignment with retention schedule; Needs Attention = does not include retention guidance or reference to the retention schedule.

Unclear roles and responsibilities increase risk

The 2019 information technology and security audit included recommendations to improve surveillance camera governance. During the initial phase of the current audit similar governance risks were evident. This indicated that the Camera Governance Group (committee) that was expected to address the 2019 audit recommendation may not be functioning as intended.

It was difficult to determine the status of camera policies from those identified as being part of the committee and the designated camera managers at each facility. One camera site owner did not appear to be aware if there was a policy. Another camera site owner thought IT managed their policy and appeared surprised that they did not have a site-specific policy. This indicated unclear roles and responsibilities for developing policies and managing compliance.

According to information about the committee, the responsibilities of a camera site owner included authorizing access, placement, and purchase of security cameras. They were also supposed to review existing camera systems to ensure compliance and serve as site-specific representatives on the committee.

The policies we reviewed had inconsistent guidance about roles and responsibilities. Only the draft Metro-wide policy mentioned responsibilities of the camera site owners and the committee. The other policies did not reference the camera site owners or committee. In fact, some of the same responsibilities assigned to the camera site owners and committee in the draft Metro-wide policy were assigned to other positions. For example, in the Expo and OCC policies, oversight of security cameras was assigned to specific positions. In contrast, the Zoo’s draft policy noted that the Zoo’s Public Safety Department was responsible for implementing and maintaining the policy.

Another role of the committee, according to the draft policy, was to make strategic decisions regarding the camera system. We heard the camera service provider was planning to discontinue supporting the platform in the future. Based on information posted on the vendor's website, Metro has until August 2028 to upgrade platforms. Although the draft policy suggests the committee is responsible for overseeing these matters, their role was unclear. IT was leading efforts to plan for the future system. It could be valuable to clarify the specific roles of the committee and IT.

IT's capital improvement plan included a \$250,000 project related to the camera system. The FY2024-25 budget indicated the project would take place in FY2026-27. According to the National Institute for Systems and Technology (NIST), a system is considered unsupported when a vendor discontinues providing critical software patches or product updates. They warn that these types of unsupported systems can allow people to take advantage of weaknesses. In the event an organization's business needs require continued use, they recommend developing in-house support to customize patches or contract with external providers for maintenance.

Metro has committed to implementing the NIST Cybersecurity Framework (CSF). This framework includes six functions: Govern, Identify, Protect, Detect, Respond, and Recover. Metro's committee and the designated camera site owners are areas where improvements are needed. Implementing elements of the Govern function for camera surveillance could help clarify the purpose and authority of the current governance structure. It could also help to solidify the expectations of the camera site owners as well as ensuring consistent retention guidance in policy.

Recommendations

To strengthen security camera policies, the DCOO, General Manager of Visitor Venues, and Chief Information Officer should:

1. Ensure all surveillance camera policies are aligned with the records retention schedule.
2. Notify managers at each Metro facility about the policies.

To strengthen security camera governance, the DCOO, General Manager of Visitor Venues, and IT Department Director, should:

3. Establish roles and responsibilities for surveillance camera use, including but not limited to:
 - a. Purpose and authority of any committees
 - b. Authority to set standards and policies
 - c. Document who is responsible for policy compliance at each facility
 - d. Document who is responsible for monitoring agency-wide compliance
 - e. Document who is responsible for maintaining the current camera systems and planning for future needs

Methodology

A performance audit of information technology was included in the FY2024-25 audit schedule. The audit was initiated in August 2024. To inform the scope of the audit, we reviewed management's efforts to address the 2019 recommendations. The camera surveillance was addressed in recommendation 3a-d and reported as *in process* by management in 2024. While efforts were underway to address the recommendation, we found significant risks related to retention and governance. Audit standards require auditors to follow up when control weaknesses are identified and communicate them to management.

To determine the status and potential risks posed by control weaknesses, we conducted interviews, reviewed camera policies, and used Metro's records retention schedule and NIST CSF functions as criteria. The audit was conducted according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for the findings and conclusions in this memo.

Memo



Metro

600 NE Grand Ave.
Portland, OR 97232-2736

Date: January 24, 2025
To: Brian Evans, Auditor
From: Marissa Madrigal, COO
Andrew Scott, DCOO
Rachel Tull, Chief Information Officer
Subject: Early Communication - Surveillance Camera Controls

Thank you for the early communication on issues around Metro's surveillance camera controls. Management agrees with your recommendations. We believe they will strengthen administration of our surveillance systems and we are moving quickly to implement them.

Your letter listed two main areas of concern:

- Inconsistencies in public records retention policies
- Role and effectiveness of the Camera Governance Group

Inconsistencies in retention policies

Management agrees that there is inconsistent language in department surveillance camera policies that could potentially lead to non-compliance with Metro's records retention schedule. Management has already clarified the retention expectations with OCC, Expo, and the Zoo, and we will be communicating with all departments in the next few weeks to reinforce the importance of compliance with Metro's records retention policies.

In addition, Metro will soon be finalizing a new Video Surveillance and Security Camera policy (see below). The new policy requires site camera owners to ensure that department systems and equipment meet Metro's records retention and security requirements. The new policy allows departments that have site-specific needs to create department-specific addendums to the policy, but separate department policies are not necessary nor required. Metro's agency-wide record retention policy is the controlling authority on surveillance video retention, and we will ensure that department-specific policy addenda comply.

Role and effectiveness of Camera Governance Group

Management agrees that Metro should strengthen the role of the Camera Governance Group. Metro created the Camera Governance Group in 2018 to help the agency coordinate on its shared security camera platform, identify camera system roles, and provide for facility-specific needs. High turnover of facilities staff in departments, along with the elevation of other priorities during and after the pandemic, has hindered consistent coordination with this group.

As part of the draft Video Surveillance and Security Camera Policy, each location must identify a camera owner who is responsible for authorizing access to the site's camera system, placement of security cameras, purchase of new security cameras, complying with the policy and creating site-specific standards for use of security cameras. Once the surveillance camera policy is adopted, IT will work with the governance group on implementation of all aspects of the policy and will complete an annual review to validate roles in the facilities. We expect to have the policy finalized

by February 14, 2025. The policy is subject to impact bargaining with our labor partners, which could take up to 90 days, before final adoption. However, management has already been communicating to departments about the policy requirements and will continue to do so while awaiting final adoption.

The early communication also noted that Metro's camera service provider is planning to discontinue supporting the software platform in the future. In March 2024, Metro staff were informed about this possibility¹. In response, IT brought the Camera Governance Group together on December 12, 2024, to update the group on the status of the video surveillance system policy and to discuss the status of the system. We discussed the possibility that the system will be discontinued and discussed next steps to replace the surveillance system software. If software support is discontinued, Metro will need to replace our existing software by 2027, and we also would have the option of moving to Version 6.3, which will extend full support to 2028.

As part of IT's regular capital planning, funding to update or replace the camera software was included in the fiscal year 2025-26 CIP request.

Management response to recommendations:

To strengthen security camera policies, the DCOO, General Manager of Visitor Venues and Chief Information Officer should:

- 1. Ensure all surveillance camera policies are aligned with the records retention schedule*
- 2. Notify managers at each Metro facility about the policies*

Management agrees with this recommendation. We are already communicating with departments to ensure they are in compliance, and we will be communicating with facility managers about the new policy once it is final (mid-February) and after it is formally adopted (no later than 90 days after we begin impact bargaining).

To strengthen security camera governance, the DCOO, General Manager of Visitor Venues, and IT Chief Information Officer, should:

- 3. Establish roles and responsibilities for surveillance camera use, including but not limited to:*
 - a. Purpose and authority of any committees*
 - b. Authority to set standards and policies*
 - c. Document who is responsible for policy compliance at each facility*
 - d. Document who is responsible for monitoring agency-wide compliance*
 - e. Document who is responsible for maintaining the current camera system and planning for future needs.*

Management agrees with this recommendation. The new policy includes roles and responsibilities for camera ownership at each facility. We will add language to the policy to indicate the authority of the surveillance camera governance group, overall system planning responsibility and monitoring of agency-wide compliance.

¹ In early 2024 Qognify, the company that owns our Ocularis system, was purchased by Hexagon. In March, Metro's video system partner, GBManchester, informed IT that Hexagon was planning to discontinue the Ocularis product line. Hexagon has not notified Metro about this change and Hexagon's website shows that Metro's current version of the software is fully supported until 2027.