INTRODUCTION

This policy establishes standards and procedures for the collection, retention and privacy of license plate recognition data at the University of Nevada, Las Vegas (UNLV). Parking and Transportation Services utilizes vehicle license plate recognition (LPR) hardware and software for its parking system enforcement on the Maryland, Paradise, and Shadow Lane Campuses. LPR and pay-by-plate technology specifically connects campus-parking permits to individual vehicle license plates. These technology improvements significantly enhance and simplify the customer experience, enforcement, and parking lot utilization analysis.

LPR has replaced much of the process of entering the plate into the system manually or calling it in over a radio. It allows the driver to focus on driving, increases the enforcement personnel’s efficiency in campus parking enforcement, all while accomplishing the same process as before, just by a different means of data entry. As a result of this process, each vehicle is required to have the vehicle positioned in a parking space so a front or back license plate is facing the drive aisle from which they pulled in from. LPR data in itself contains no personally identifiable information (PII).

DEFINITIONS

LPR: License Plate Reader system in which automobile-mounted cameras photograph and read license plates of vehicles in its view.
LPR Data: The photographs, license numbers, time and location information available within the LPR database.

**PURPOSE**

Parking and Transportation Services at the University of Nevada, Las Vegas, uses a license plate recognition (LPR) system, which integrates with and accesses permit information from the currently used parking management system. This management system integrates the permit and enforcement information within one system.

**ENFORCEMENT AUTHORITY**

The Nevada System of Higher Education Board of Regents (BOR) has the authority to prescribe rules for the government of the System (NRS 396.110). The BOR has the express statutory authority to regulate vehicular traffic on all property owned by the System (NRS 396.435).

The BOR has granted authority to the UNLV President to create and enforce regulations pertaining to parking of motor vehicles on the property under the jurisdiction of UNLV. BOR Handbook, Title 4, Chapter 1, Section 11 states: “The president of each institution shall have the authority to establish, approve, and enforce parking and traffic regulations that govern the movement, operation, and parking of motor vehicles on property under the jurisdiction of the institution. Such regulations shall be in compliance with the Nevada Revised Statutes and applicable county codes.

**AUTHORIZED USERS**

The following UNLV Parking and Transportation Services staff involved in the enforcement of parking are authorized to access reports and utilization data for planning/operational purposes:

Director  
Assistant Director  
Parking Operations and Event Manager  
Planning Assistant

And all classified staff falling within the classifications of:  
NSHE Specialist 1  
Accounting Technician 1  
Parking Enforcement Officer 2  
Administrative Assistants

The extent of information available to Parking and Transportation Services staff and defined user rights to each of the positions above will be based on the individual’s need for access and their departmental function. As previously stated, the LPR data in itself does not contain any personally identifiable information.
LOCATION

LPR data is collected on UNLV parking lots and parking areas, campus streets, and other areas that UNLV is or may become responsible for, including the Maryland, Shadow Lane, and Paradise campuses, any parking garages on or around the campuses designated for student use, and various properties along Maryland Parkway between Tropicana Avenue and Flamingo Avenue. LPR data is collected by cameras positioned on a mobile vehicle-mounted system. LPR vehicles are driven by trained personnel in parking locations throughout UNLV properties. LPR vehicles can be active 24 hours daily, 7 days per week where needed. UNLV also utilizes a number of handheld devices, also used by trained personnel in parking locations throughout the university and associated areas included in this policy.

DATA COLLECTED

The LPR system captures two photos of observed vehicles; a context photo of the vehicle and its immediate surroundings, and a photo of the license plate. Typically, these photos are taken from the rear of the vehicle, although there are occasions where a photo is taken from the front (e.g. when a car is backed into a parking space). The photos are not of a resolution that allows identification of a vehicle occupant if they are present. Along with the photographic data, the system also records the Global Positioning System (GPS) coordinates and date/time information of the observation. Further software processing of the vehicle license plate image generates an alphanumeric version of the vehicle license plate number which is also stored with the parking LPR record. While no owner or driver information is stored directly with the LPR record, vehicle LPR data is linked to individual patron accounts within the parking management system.

USE OF DATA

The intended use of data collected by the LPR system and related photographs is for parking related enforcement and planning. LPR data is used to determine a vehicle’s parking permit status in a given parking area and support the issuance of a parking citation if needed. The data may be used upon request by the UNLV Department of Police Services in assisting with compulsory law enforcement investigations. Any use of the data for purposes outside of these stated purposes must be detailed and approved in writing through administrative channels by the Executive Director of Administration within the division of Finance and Business.

DATA RETENTION

Data collected by the LPR system not resulting in parking enforcement action may only be retained up to 365 days. Data resulting in parking enforcement action is retained with the citation record for at least 365 days or longer as needed, in keeping with current Parking and Transportation Services retention of citation data policies. Statistical lot utilization data (generic
vehicle counts) is retained indefinitely for parking program planning and operations. Data resulting in parking enforcement action is retained with the citation (ticket) records.

ACCESS TO RECORDS

Access to records created and maintained by the LPR system is restricted to trained University of Nevada, Las Vegas parking personnel performing legitimate parking enforcement/management duties. All personnel with access to the system use unique identifiers and passwords to access records and all login activity, record additions, and other activity is logged. Access to the system by others is prohibited.

DATA REQUESTS

Students, faculty and staff with a university issued UNLV photo identification card may obtain what, if any, LPR data that exists about their vehicles registered with Parking and Transportation Services. The registered vehicle owner may not access data pertaining to other permit holders. The information must be requested in person for proof of identity.

Requests from vehicle owners not affiliated with the University (and who therefore do not have a University-issued ID) may be made by presenting Parking and Transportation Services with proof of ownership of the vehicle along with a valid photo ID, subject to restrictions imposed by applicable law, including but not limited to FERPA. Such requests, and all other external requests for records, will be handled on a case-by-case basis.

POLICY NOTIFICATION

UNLV will notify all registered permit holders of its LPR data collection activities and policies by way of posting this privacy policy on the Parking and Transportation Services website (available to the public) and include it as part of an annual email that goes out to all faculty, staff, and students. It is important for each registered user to maintain and update their contact information with our parking management system to receive important notices.