



**City of St. Paul Police Department
Portable Recording System (PRS) Biennial Audit
Audit Findings Summary
November 17, 2023**

At the request of the City of St. Paul Police Department (SPPD), LOGIS has conducted the biennial audit of their Portable Recording System (PRS) pursuant to Minnesota Statute §13.825 Subd. 9.

Minnesota Statute §13.825 data elements include:

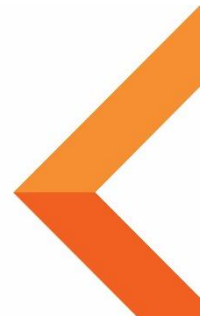
- Data Classification
- Retention of Data
- Access by Data Subjects
- Inventory of Portable Recording System Technology
- Use of Agency-Issued Portable Recording Systems
- Authorization to Access Data
- Sharing Among Agencies
- Biennial Audit
- Notification to the BCA
- Portable Recording System Vendor
- Penalties for Violation

After analysis of the statutory requirements and evaluation of the City of St. Paul Police Department's management and use of Portable Recording System technology, LOGIS has found the City of St. Paul Police Department in compliance with Minnesota Statute §13.825 based on the following findings:



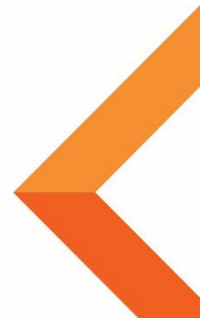


Control #	Statute Subd	Control Objective	Testing Procedure	Testing Result
1	§13.825 Subd. 2	Data collected is classified	<p>Reviewed SPPD Body Worn Camera (BWC) Policy 442.18, Section 15 Data Categorization</p> <p>Reviewed SPPD BWC Policy 422.18, Section 19 Private, Confidential and Public BWC Data</p> <p>Reviewed SPPD General Order 235.00 Data Practices</p> <p>SPPD provided screen print of video lockdown which places video into a Restricted status limiting who can view video files.</p> <p>Reviewed Axon/Evidence.com configuration settings, screen prints provided</p> <p>Interviewed SPPD staff and officers responsible for PRS system administration</p>	No exceptions found
2	§13.825 Subd. 3	Retention of data	<p>Reviewed SPPD Policy 442.18 which covers the process for retention of data based upon its classification</p> <p>Review General Order 235.00 Data Practices which covers data access procedures, dissemination, and requests by the media or public</p> <p>Video data is retrained for a minimum of 1 year unless otherwise classified by statute or SPPD policy</p>	No exceptions found



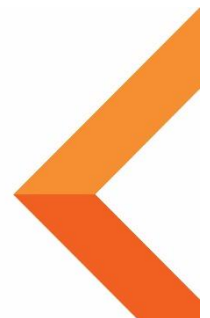


			<p>PRS is configured to retain data for specified periods based upon its categorization</p> <p>SPPD provided screen print of PRS data categorization and retention schedule</p> <p>Interviewed SPPD staff and officers responsible for PRS system administration</p>	
Control #	Statute Subd	Control Objective	Testing Procedure	Testing Result
3	§13.825 Subd. 4	Access by data subjects	<p>Reviewed SPPD Policy 442.18, Section 20 Access by Data Subjects</p> <p>Reviewed SPPD Policy 235.10 – Dissemination of Criminal Data which covers the dissemination of data with other agencies</p> <p>SPPD provided screen print of the Data Request Portal where subjects can request BWC video</p> <p>Reviewed SPPD BWC Policy 442.18, Section 25 Release to the Public, which directs who and how data is to be provide along with notification requirements</p> <p>Interviewed SPPD staff and officers responsible for PRS system administration</p>	No exceptions found
4	§13.825 Subd. 5	Inventory of PRS technology	<p>Reviewed SPPD Policy 442.18, Section 6 Inventory Control</p> <p>SPPD maintains an inventory of 743 cameras which includes assigned, in stock</p>	No exceptions found



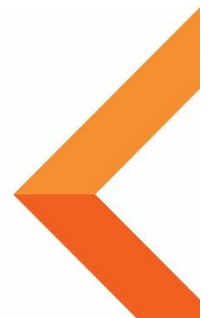


			<p>and lost devices, 579 cameras are deployed, and each camera is assigned to a unique member of the SPPD</p> <p>5.1 - SPPD provided screen capture of the total number of devices in system</p> <p>5.2 - SPPD provided screen capture showing daily log of deployed devices</p> <p>5.3 - SPPD Policy 442.18 Body Worn Camera Policy, SPPD Policy 442.19 – Body Worn Camera - Quality Control Process</p> <p>5.4 - SPPD provided screen print of the total amount of data stored</p>	
Control #	Statute Subd	Control Objective	Testing Procedure	Testing Result
5	§13.825 Subd. 6	Use of agency-issued devices	<p>Reviewed SPPD BWC Policy 442.18, Section 16 Department Issued Cell Phones.</p> <p>Interviewed SPPD staff and officers responsible for PRS system administration</p>	No exceptions found
6	§13.825 Subd. 7	Authorization to access data	<p>Reviewed SPPD BWC Policy 442.19, Quality Control Process</p> <p>Reviewed SPPD BWC Policy 442.18, Section 37 Data Breach Policy and Procedures</p> <p>SPPD provide screen print of authorized users and their applicable roles</p> <p>Interviewed SPPD staff and officers responsible for PRS system administration</p>	No exceptions found





7	§13.825 Subd. 8	Sharing among agencies	<p>Reviewed SPPD Policy 442.18, Section 36 Security Access Control Procedures, Outside Law Enforcement Agencies and Attorney Offices</p> <p>Reviewed SPPD Policy 235.10 Dissemination of Criminal Data Policy which covers sharing of data with other agencies</p> <p>Interviewed SPPD staff and officers responsible for PRS system administration</p>	No exceptions found
8	§13.825 Subd. 9	Biennial audit	<p>Reviewed SPPD Policy 442.18, Section 36 Security Access Control Procedures para. F</p> <p>Reviewed MN Legislative Reference Library for past audits</p>	No exceptions found
9	§13.825 Subd. 10	Notification to the Bureau of Criminal Apprehension	Reviewed SPPD Policy 442.18, Section 38 Notification to Bureau of Criminal Apprehension	No exceptions found
10	§13.825 Subd. 11	PRS vendor	Reviewed SPPD Policy 442.18, Section 36 Security Access Control Procedures para. H	No exceptions found
11	§13.825 Subd. 12	Penalties for Violation	Reviewed SPPD Policy 442.18, Section 37 Data Breach Policy and Procedures: Penalties	No exceptions found





The findings in the Portable Recording System Audit are impartial and based on information and documentation provided by the City of St. Paul Police Department and examined by LOGIS Information Security staff and management.

It demonstrates that the security, public accountability, and administration of the St. Paul Police Department Portable Recording System program meets the requirements and is compliant with MN Statute §13.825.

Local Government Information Systems (LOGIS) attested this audit on November 17, 2023:

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Patrick Buie

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Patrick Buie

Local Government Information Systems, Information Security Specialist

Eric Kammerer

Eric Kammerer

Commander, St. Paul Police Department, Technology Unit

Respectfully submitted to the following:

Eric Kammerer, Commander, City of St. Paul Police Department, Technology Unit

Legislative Law Library

Legislative Commission on Data Practices and Personal Data Privacy

Committee Chair and Ranking Minority Members of the following:

House Judiciary and Civil Law

House Public Safety

Senate Judiciary

