City of St. Paul Police Department
Portable Recording System (PRS) Biennial Audit
Results Report
November 9, 2021

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	Reviewed SPPD Body Worn Camera (BWC) Policy 442.18, Section 15 Data Categorization Reviewed SPPD BWC Policy 422.18, Section 19 Private, Confidential and Public BWC Data SPPD provided screen print of video lockdown which restricts who can see data Reviewed Axon/Evidence.com configuration settings, screen prints provided Interviewed SPPD staff and officers responsible for PRS system administration	No exceptions found
2	§13.825 Subd. 3	Retention of data	SPPD Policy 442.18 covers the process for retention of data based upon its classification Data is retrained for a minimum of 1 year unless otherwise classified by statute or SPPD policy PRS is configured to retain data for specified periods based upon its categorization SPPD provided screen print of PRS data categorization and retention schedule Interviewed SPPD staff and officers responsible for PRS system administration	No exceptions found

Control #	Statute Subd	Control Objective	Testing Procedure	Testing Result
3	§13.825 Subd. 4	Access by data subjects	Reviewed SPPD Policy 442.18, Section 20 Access by Data Subjects SPPD provided screen print of the Data Request Portal where subjects can request BWC video 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 Interviewed SPPD staff and officers responsible for PRS system administration	No exceptions found
4	§13.825 Subd. 5	Inventory of PRS technology	Reviewed SPPD Policy 442.18, Section 6 Inventory Control SPPD maintains an inventory of 689 cameras, 576 cameras are deployed and each camera is assigned to a unique member of the SPPD 5.1 - SPPD provided screen capture of the total number of devices in system 5.2 - SPPD provided screen capture showing daily log of deployed devices 5.3 - SPPD Policy 442.18 Body Worn Camera Policy, SPPD Policy 442.19 – Body Worn Camera - Quality Control Process 5.4 - SPPD provided screen print of the total amount of data stored	No exceptions found

Control #	Statute Subd	Control Objective	Testing Procedure	Testing Result
5	§13.825 Subd. 6	Use of agency-issued devices	Reviewed SPPD BWC Policy 442.18, Section 16 Department Issued Cell Phones. Interviewed SPPD staff and officers responsible for PRS system administration	No exceptions found
6	§13.825 Subd. 7	Authorization to access data	Reviewed SPPD BWC Policy 442.19, Quality Control Process Reviewed SPPD BWC Policy 442.18, Section 37 Data Breach Policy and Procedures SPPD provide screen print of authorized users and their applicable roles Interviewed SPPD staff and officers responsible for PRS system administration	No exceptions found
7	§13.825 Subd. 8	Sharing among agencies	Reviewed SPPD Policy 442.18, Section 36 Security Access Control Procedures, Outside Law Enforcement Agencies and Attorney Offices Interviewed SPPD staff and officers responsible for PRS system administration	No exceptions found
8	§13.825 Subd. 9	Biennial audit	Reviewed SPPD Policy 442.18, Section 36 Security Access Control Procedures para. F Reviewed MN Legislative Reference Library for past audits	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

Control #	Statute Subd	Control Objective	Testing Procedure	Testing Result
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 SPPD PRS program is in compliance with MN Statute §13.825.

Local Government Information Systems (LOGIS) attested this audit on November 9, 2021:

Patrick Buie
LOGIS
Information Security Specialist

Respectfully submitted to the following:
    Robert Thomasser, City of St. Paul, Assistant Chief of Police
    Legislative Law Library
    Legislative Committee's
        Legislative Commission on Data Practices
        Judiciary Finance and Civil Law
        Public Safety and Criminal Justice Reform Finance and Policy
        Civil Law and Data Practices Policy
        Judiciary and Public Safety Finance Policy