



**City of St. Paul Police Department
Portable Recording System (PRS) Biennial Audit
Audit Summary
October 15, 2025**

At the request of the City of St. Paul Police Department (SPPD), Local Government Information Systems (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
- Data Retention
- 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

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.





Statute Subdivision	Control Objective	Testing Procedure	Testing Result
§13.825 Subdivision 2	Data Classification	<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 and screen prints provided</p>	SPPD PRS data is properly classified according to statutory requirements set forth by MN Statute §13.825 Subdivision 2
§13.825 Subdivision 3	Data Retention	<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 MN statute or SPPD policy</p> <p>SPPD provided screen print of PRS data categorization and retention schedule</p>	SPPD data retention schedules meet the retention requirements set forth by MN Statute §13.825 Subdivision 3



Statute Subdivision	Control Objective	Testing Procedure	Testing Result
§13.825 Subdivision 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 provided along with notification requirements</p>	SPPD data request processes and policies meet the data access requirements set forth by MN Statute §13.825 Subdivision 4
§13.825 Subdivision 5	Inventory of PRS technology	<p>Reviewed SPPD Policy 442.18, Section 6 Inventory Control</p> <p>SPPD is currently in the process of deploying new cameras to their inventory. The current count of 1,360 cameras contains both new and old inventory.</p> <p>Which includes: 570 assigned, in stock and lost devices, each active 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>	SPPD camera inventory meets the requirements set forth MN Statute §13.825 Subdivision 5



Statute Subdivision	Control Objective	Testing Procedure	Testing Result
§13.825 Subdivision 6	Use of agency-issued devices	Reviewed SPPD BWC Policy 442.18, Section 16 Department Issued Cell Phones. Policy clearly states that only agency issued devices are authorized for use by department employees	SPPD policy for the use of agency issued devices meets the requirements set forth MN Statute §13.825 Subdivision 6
§13.825 Subdivision 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 provided screen prints of authorized users and their applicable roles	SPPD policy for authorizing access to PRS data and devices meets the requirements set forth MN Statute §13.825 Subdivision 7
§13.825 Subdivision 8	Sharing among agencies	Reviewed SPPD Policy 235.10 Dissemination of Criminal Data Policy which covers sharing of data with other agencies	SPPD policy for sharing PRS data with other law enforcement agencies meets the requirements set forth MN Statute §13.825 Subdivision 8





Statute Subdivision	Control Objective	Testing Procedure	Testing Result
§13.825 Subdivision 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>	SPPD policy for conducting biennial audits of PRS systems meets the requirements set forth MN Statute §13.825 Subdivision 9
§13.825 Subdivision 10	Notification to the Bureau of Criminal Apprehension	<p>Reviewed SPPD Policy 442.18, Section 38 Notification to Bureau of Criminal Apprehension</p> <p>Policy clearly states that any major changes to the PRS technology must be reported to the Minnesota BCA</p>	SPPD policy for notification of PRS system changes meets the requirements set forth in MN Statute §13.825 Subdivision 10
§13.825 Subdivision 11	PRS Vendor	SPPD currently uses Axon Body 4 firmware version v1.2534	SPPD is using the latest firmware release and meets the requirements set forth in MN Statute §13.825 Subdivision 11





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 meet the requirements and is compliant with MN Statute §13.825. Local Government Information Systems (LOGIS) attested this audit on October 15, 2025.

Patrick Buie

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Paul A. Ford

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Respectfully submitted to the following:

Paul Ford, Assistant Chief, City of St. Paul Police Department
Legislative Law Library
Judiciary Finance and Civil Law (Rep. Becker-Finn and Rep. Scott)
Public Safety Finance and Policy (Rep. Moller and Rep. Novotny)
Judiciary and Public Safety Finance and Policy Committee (Sen. Warren Limmer and Sen. Ron Latz)

