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May 9, 2022

Senator Warren Limmer, Chair
Legislative Coordinating Commission Subcommittee on Data Practices
3221 Minnesota Senate Building
95 University Ave. W.
St Paul, MN 55115

Representative John Lesch, Vice Chair
Legislative Coordinating Commission Subcommittee on Data Practices
563 State Office Building
100 Rev. Dr. Martin Luther King, Jr. Blvd.
St. Paul, MN 55155

Sally Olson, Commission Administrator
Legislative Coordinating Commission Subcommittee on Data Practices
72 State Office Building
100 Rev. Dr. Martin Luther King, Jr. Blvd.
St. Paul, MN 55155

Enclosed please find the Minneapolis Park & Recreation Board Police Department Body Worn Camera (BWC) Audit Report, for the period March 3, 2022, to April 15, 2022.

Sincerely,

A handwritten signature in blue ink that reads "Peggy Menshek".

Peggy Menshek
City Clerk's Office

cc: Legislative Reference Library, refdesk@lrl.leg.mn
Ryan Patrick, Director of Minneapolis Internal Audit

Enclosures: Certificate of Audit Summary Report by Governing Body
Minneapolis Park & Recreation Board Police Department Body Worn Camera (BWC) Audit Report

CERTIFICATE OF AUDIT SUMMARY REPORT

BY GOVERNING BODY

(Pursuant to Minnesota Statute 13.825, subd. 9)

STATE OF MINNESOTA

County of Hennepin

TO THE LEGISLATIVE COORDINATING COMMISSION SUBCOMMITTEE ON DATA PRACTICES (FORMERLY LEGISLATIVE COMMISSION ON DATA PRACTICES AND PERSONAL DATA PRIVACY):

PLEASE TAKE NOTICE, That the undersigned chief clerical officer of the City of Minneapolis DOES HEREBY CERTIFY, that in compliance with the provisions of Minnesota Statute 13.825, portable recording systems, Wildcard Corporation conducted an audit of the Minneapolis Park & Recreation Board Police Department Body Worn Camera Audit system to ensure compliance with state laws in accordance with Minnesota Statute 13.825, and was presented to the City Audit Committee on April 25, 2022, and published on April 25, 2022. The scope of the audit covers March 3, 2022, to April 15, 2022.

A copy of the Minneapolis Park & Recreation Board Police Department Body Worn Camera Audit Report is hereto annexed and made a part of this certificate by reference.



Signed: _____

Casey Joe Carl
Casey Joe Carl, City Clerk
City of Minneapolis
(Official designation of officer)

Minneapolis Park and Recreation Board Police Department

Body Worn Camera Audit

Abstract

This document has been drafted to provide a Body Worn Camera Audit to the Minneapolis Park and Recreation Board Police Department.



CYBERSECURITY • WEB DEVELOPMENT • IT SOLUTIONS

Point of Contact: Wildcard Corp. Cybersecurity Team security@wildcardcorp.com

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Assessment Team
Dean Pehlke, Director of Cybersecurity
Austin Marten, Cybersecurity Analyst

Report Date: 18 April 2022
Assessment Start Date: 03 March 2022
Assessment End Date: 15 April 2022

Executive Summary

Wildcard was contracted by the Minneapolis Park and Recreation Board (MPRB) Police Department to conduct an audit of the policies and procedures regarding Portable Recording Systems (PRS) a.k.a. Body Worn Cameras (BWC) in accordance with [MN State Statute 13.825 Subd. 9](#) and all other related sections and subdivisions. In our evaluation, we have determined the MPRB Police Department to be in compliance. While requirements were met, we have found discrepancies in regards to password policy and deletion of downloaded/duplicated BWC footage.

Scope

The scope of this audit is defined in [MN State Statute section 13.825, subd. 9](#) and all referenced subdivisions and sections. The objective of this engagement is to audit compliance with BWC laws and regulations, and review relevant policies, procedures and security controls, as required by Minnesota state statute. Wildcard conducted an independent review of MPRB Police Department's BWC processes to determine how data is being classified, used, and destroyed.

The following resources were utilized:

- evidence.com account list (name, status [active, inactive], role, last login date)
- MPRB Police Department Policy and Procedure
- evidence.com audit trails
- Interviews with users of BWCs and evidence.com
- A demo of evidence.com
- MN State Statute

Audit Objectives

Assess the MPRB Police Department's use of BWC to determine compliance with Minnesota statute 13.825.

Review, examine, and assess MPRB Police Department policies and procedures for the operation of BWC to determine if there is any potential for improvement to support compliance efforts and operation.

The BWC audit is a biennial audit mandated by state law. Upon evaluation we determined that the MPRB Police Department operates within compliance with state statute. Interviews were conducted with BWC users, system logs and settings were reviewed and evaluated against Minnesota state statute along with MPRB Police Department policies.

Executive Summary

Observations

The most evident example of a potential issue is the deletion process of BWC data in accordance with [13.05 subd. 5, sub-section \(b\)](#). While deletion of data in evidence.com is assumed to be done securely by Axon, copies of data are occasionally downloaded by the department for various reasons. BWC video data has been downloaded and stored on work computers.

Passwords

According to interviews with employees, along with Information provided by the MPRB Police Department, password length requirements for evidence.com is 8 characters in length. Recommendations below should be considered.

Computers

As mentioned above in the findings section of this report, the MPRB Police Department will download BWC footage to their desktops for various purposes. Footage downloaded from evidence.com will temporarily be stored locally on an authorized individual's computer to later be transferred to a requesting party in accordance with policy and procedure which will then be approved by appropriate staff. BWC footage will then be deleted from the computer that it was downloaded to. However within Minnesota state statute, the following recommendations should be considered.

Recommendations

- 1.** Increase the password length for evidence.com login authorization. We recommend an increase from 8 characters in length to 12 characters for passwords.
 - a.** Although evidence.com is assumed to be secure, an increase in password length is recommended as it provides additional security.
- 2.** Train individuals on the proper destruction of BWC footage. In order to protect against malware and malicious users of shared systems, it should include the following:
 - a.** Overwriting old file contents and not just deleting the file's reference,
 - b.** Overwriting file contents multiple times for systems running on hard disk drives.