



**City of Coon Rapids Police Department
Portable Recording System (PRS) Biennial Audit
Audit Findings Summary
January 25, 2024**

At the request of the City of Coon Rapids Police Department (CRPD), 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 Coon Rapids Police Department's management and use of Portable Recording System technology, LOGIS has found the City of Coon Rapids Police Department in compliance with Minnesota Statute §13.825 based on the following findings:

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Portable Recording System Biennial Audit
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Control #	Statute Subd	Control Objective	Testing Procedure	Testing Result
1	§13.825 Subd. 2	Data collected is classified	<p>Reviewed Coon Rapids Police Department (CRPD) Policy 4-411, Section Downloading and Labeling Data, Items A & B.</p> <p>A. Each officer using a BWC is responsible for transferring or assuring the proper transfer of the data from his or her camera to the approved network storage system by the end of that officer's shift. However, if the officer is involved in a shooting, in-custody death, or other law enforcement activity resulting in death or great bodily harm, a supervisor or investigator shall take custody of the officer's BWC and assume responsibility for transferring the data from it.</p> <p>B. Officers shall label the BWC data files at the time of capture or transfer to storage and should consult with a supervisor if in doubt as to the appropriate labeling.</p> <p>Interviewed CRPD staff and officers responsible for PRS system administration</p>	No exceptions found CRPD is compliant with §13.825 Subd. 2





2	§13.825 Subd. 3	Retention of data	<p>Reviewed Coon Rapids Police Department (CRPD) Policy 4-411, Section Data Retention, Items A-H.</p> <p>A. All BWC data shall be retained for a minimum period of 90 days. There are no exceptions for erroneously recorded or non-evidentiary data.</p> <p>B. Data documenting the discharge of a firearm by a peace officer in the course of duty, other than for training or the killing of an animal that is sick, injured, or dangerous, must be maintained for a minimum period of one year.</p> <p>C. Certain kinds of BWC data must be retained for seven years:</p> <ol style="list-style-type: none"> 1. Data that documents the use of deadly force by a peace officer, or force of a sufficient type or degree to require a use of force report or supervisory review. 2. Data documenting circumstances that have given rise to a formal complaint against an officer. <p>D. Other data having evidentiary value shall be retained for the period specified in the Records Retention Schedule. When a particular recording is subject to multiple retention periods, it shall be maintained for the longest applicable period.</p>	<p>No exceptions found CRPD is compliant with §13.825 Subd. 3</p>
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			<p>E. Subject to Part F (below), all other BWC footage that is classified as non-evidentiary, becomes classified as non-evidentiary, or is not maintained for training shall be destroyed after 90 days.</p> <p>F. Upon written request by a BWC data subject, the agency shall retain a recording pertaining to that subject for an additional time period requested by the subject of up to 180 days. The agency will notify the requestor at the time of the request that the data will then be destroyed unless a new written request is received.</p> <p>G. The department shall maintain an inventory of BWC recordings having evidentiary value.</p> <p>H. The department will post this policy, together with its Records Retention Schedule, on its website.</p> <p>CRPD provided a screen shot of the video retention configuration settings from the Motorola Video Manager.</p> <p>Interviewed CRPD staff and officers responsible for PRS system administration</p>	
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3	§13.825 Subd. 4	Access by data subjects	<p>Reviewed Coon Rapids Police Department (CRPD) Policy 4-411, Section Administering Access to BWC Data, Item E. Access to BWC data by non-employees.</p> <p>E. Access to BWC data by non-employees. Officers shall refer members of the media or public seeking access to BWC data to the Chief of Police, or designee, who shall process the request in accordance with the MGDPA and other governing laws. In particular:</p> <p>1. An individual shall be provided with access and allowed to review recorded BWC data about him or herself and other data subjects in the recording, but access shall not be granted: a. If the data was collected or created as part of an active investigation.</p> <p>b. To portions of the data that the agency would otherwise be prohibited by law from disclosing to the person seeking access, such as portions that would reveal identities protected by Minn. Stat. § 13.82, subd. 17.</p> <p>2. Unless the data is part of an active investigation, an individual data subject shall be provided with a copy of the recording upon request, but subject to the following guidelines on redaction:</p> <p>a. Data on other individuals in the</p>	<p>No exceptions found CRPD is compliant with §13.825 Subd. 4</p>
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			<p>recording who do not consent to the release must be redacted.</p> <p>b. Data that would identify undercover officers must be redacted.</p> <p>c. Data on other officers who are not undercover, and who are on duty and engaged in the performance of official duties, may not be redacted.</p> <p>Interviewed CRPD staff and officers responsible for PRS system administration</p>	
4	§13.825 Subd. 5	Inventory of PRS technology	<p>Reviewed Coon Rapids Police Department (CRPD) Policy 4-411, Section Use and Documentation, Item F.</p> <p>F. The department will maintain the following records and documents relating to BWC use, which are classified as public data: 1. The total number of BWCs owned or maintained by the agency;</p> <p>2. A daily record of the total number of BWCs actually deployed and used by officers.</p> <p>3. The total amount of recorded BWC data collected and maintained; and</p> <p>4. This policy, together with the Records Retention Schedule.</p>	No exceptions found CRPD is compliant with §13.825 Subd. 5





			Interviewed CRPD staff and officers responsible for PRS system administration	
5	§13.825 Subd. 6	Use of agency-issued devices	<p>Reviewed Coon Rapids Police Department (CRPD) Policy 4-411, Section Use and Documentation, Items A & B.</p> <p>A. Officers may use only department-issued BWCs in the performance of official duties for this agency or when otherwise performing authorized law enforcement services as an employee of this department.</p> <p>B. Officers who have been issued BWCs shall operate and use them consistent with this policy. Officers shall conduct a function test of their issued BWCs at the beginning of each shift to make sure the devices are operating properly. Officers noting a malfunction during testing or at any other time shall promptly report the malfunction to the officer's supervisor and shall deploy a working BWC. Supervisors shall take prompt action to address malfunctions.</p> <p>Interviewed CRPD staff and officers responsible for PRS system administration</p>	No exceptions found CRPD is compliant with §13.825 Subd. 6





6	§13.825 Subd. 7	Authorization to access data	<p>Reviewed Coon Rapids Police Department (CRPD) Policy 4-411, Section Administering Access to BWC Data, Item F.</p> <p>F. No employee may have access to the department's BWC data except for legitimate law enforcement or data administration purposes:</p> <ol style="list-style-type: none"> 1. Officers may access and view stored BWC video only when there is a business need for doing so, including the need to defend against an allegation of misconduct or substandard performance. Officers may review video footage of an incident in which they were involved prior to preparing a report, giving a statement, or providing testimony about the incident. 2. Agency personnel shall document their reasons for accessing stored BWC data at the time of each access. Agency personnel are prohibited from accessing BWC data for non-business reasons and from sharing the data for non-law enforcement related purposes, including but not limited to uploading BWC data recorded or maintained by this agency to public and social media websites. 3. Employees seeking access to BWC data for non-business reasons may make a request for it in the same manner as any member of the public. 	No exceptions found CRPD is compliant with §13.825 Subd. 7
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			<p>CRPD provide screen print of authorized users and their applicable roles</p> <p>Interviewed CRPD staff and officers responsible for PRS system administration</p>	
7	§13.825 Subd. 8	Sharing among agencies	<p>Reviewed Coon Rapids Police Department (CRPD) Policy 4-411, Section Administering Access to BWC Data, Item G.</p> <p>G. Officers may display portions of BWC footage to witnesses as necessary for purposes of investigation as allowed by Minn. Stat. § 13.82, subd. 15, as may be amended from time to time. Officers should generally limit these displays to protect against the incidental disclosure of individual identities that are not public. Protecting against incidental disclosure could involve, for instance, showing only a portion of the video, showing only screen shots, muting the audio, or playing the audio but not displaying video. In addition, 1. BWC data may be shared with other law enforcement agencies only for legitimate law enforcement purposes that are documented in writing at the time of the disclosure. 2. BWC data shall be made available to prosecutors, courts, and other criminal justice entities as provided by law.</p> <p>Interviewed CRPD staff and officers responsible for PRS system administration</p>	No exceptions found CRPD is compliant with §13.825 Subd. 8





8	§13.825 Subd. 9	Biennial audit	<p>Reviewed Coon Rapids Police Department (CRPD) Policy 4-411, Section Data Security Safeguards, Items A-D.</p> <p>A. Officers shall safeguard their username and password for the BWC system. The sharing of a user's access to the BWC system is prohibited.</p> <p>B. Personally, owned devices, including but not limited to computers and mobile devices, shall not be programmed or used to access or view agency BWC data.</p> <p>C. Officers shall not intentionally edit, alter, or erase any BWC recording unless otherwise expressly authorized by the chief or the chief's designee.</p> <p>D. As required by Minn. Stat. § 13.825, subd. 9, as may be amended from time to time, this agency shall obtain an independent biennial audit of its BWC program.</p> <p>PRS systems was installed in 2022 and this is a first-time audit.</p>	No exceptions found CRPD is compliant with §13.825 Subd. 9
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9	§13.825 Subd. 10	Notification to the Bureau of Criminal Apprehension	<p>Reviewed Coon Rapids Police Department (CRPD) Policy 4-411, Section, Notification to the BCA</p> <p>Within ten days of obtaining new surveillance technology that expands the type or scope of surveillance capability of a portable recording system device beyond video or audio recording, the department shall notify the Bureau of Criminal Apprehension that is has obtained the new surveillance technology. The notice shall include: a description of the technology, its surveillance capability and its intended uses. The notices are accessible to the public and must be available on the bureau's website.</p>	No exceptions found CRPD is compliant with §13.825 Subd. 10
10	§13.825 Subd. 11	PRS vendor	<p>Reviewed Coon Rapids Police Department (CRPD) Policy 4-411</p> <p>CRPD provided a screen print of the Motorola software version</p>	No exceptions found CRPD is compliant with §13.825 Subd. 11
11	§13.825 Subd. 12	Penalties for Violation	Reviewed Coon Rapids Police Department (CRPD) Policy 4-411	No exceptions found CRPD is compliant with §13.825 Subd. 12





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

It demonstrates that the security, public accountability, and administration of the Coon Rapids 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 January 25, 2024.

Patrick Buie
Local Government Information Systems, Information Security Specialist

Adam Jacobson
Deputy Chief of Police, Coon Rapids Police Department

Respectfully submitted to the following:

- Adam Jacobson, Deputy Chief of Police, Coon Rapids Police Department
- Legislative Reference 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

