



State-Mandated Biennial Audit of the Minneapolis Park Police Department Body-Worn Camera Program



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Executive Summary

The Office of City Auditor has completed the state-mandated biennial audit of the Minneapolis Park Police Department's (MPPD) body-worn camera (BWC) program.¹ This audit ensures MPPD follows state requirements on how BWC data are collected, stored, used, and deleted. It also promotes transparency and accountability in law enforcement.

We found MPPD complies with state requirements governing BWC use. While MPPD complies with regulations, we identified opportunities to strengthen and align with recognized best practices.

This report includes one recommendation:

1. MPPD should further develop and formally approve existing BWC standard operating procedures.

MPPD cooperated throughout the audit and welcomed feedback. Their effort to strengthen practices, even in areas where they already meet legal requirements, shows a strong commitment to public safety and continuous improvement.

I'd like to thank Community Safety Auditor Ryan Franson for leading this audit and Senior Auditor Ella Kings for her valuable contributions throughout the engagement.

An Invitation

Please reach out to the Office of City Auditor if you have questions related to this audit or if you would like to report fraud, waste, or abuse. Together, we can strengthen public trust by building a more resilient, transparent, and accountable city.



Robert Timmerman, City Auditor

¹ Minn. Stat. § 13.825, subd. 9. <https://www.revisor.mn.gov/statutes/cite/13.825>.

Objective & Conclusion

Objective

The objective of this audit was to answer the following question:

1. Is the Minneapolis Park Police Department compliant with relevant Minnesota Statutes concerning the use of body-worn cameras?

Conclusion

Based on the evidence we gathered, reviewed, and tested, we conclude that the Minneapolis Park Police Department is compliant with the relevant Minnesota State Statutes concerning the use of body-worn cameras.

We also would like to acknowledge that the Minneapolis Park Police Department has implemented all four recommendations made in the *2024 Minneapolis Park Police Biennial Body Worn Camera Audit*:

- BWC Categorization
- Independent Third-Party Assessment Report Review
- Third-Party Personal Identifiable Information (PII) Security Review
- Internal Procedure for Granting Access to Evidence.com

Although these recommendations were not required, MPPD took initiative to make improvements that bring the program in-line with best practices, particularly around information technology. We sincerely appreciate MPPD's willingness and dedication to operating this program at the highest level possible.

Background

Minnesota Statute 13.825, subd. 9 requires law enforcement agencies that use body-worn cameras to “arrange for an independent, biennial audit of the data to determine whether data are appropriately classified according to this section, how the data are used, and whether the data are destroyed as required under this section, and to verify compliance with subdivisions 7 [authorization to access data] and 8 [data and sharing among agencies].”

The Minneapolis Park Police Department (MPPD) engaged the independent Office of City Auditor to perform this critical oversight function, which was designed to ensure police departments maintain the highest standards of transparency and data integrity.

MPPD addresses body-worn camera guidelines in section 1 of the *MPPD Body Worn Camera Policy*:²

The purpose of BWC equipment use by Minneapolis Park Police Department Officers is to accomplish the following:

- Enhance accountability and public trust by preserving a record of Officer interaction with citizens.
- Capture digital audio-video evidence for criminal, civil and traffic-related court cases.
- Assist Officers by providing a record independent from their perceptions and recollections.
- Serve as a training tool for Officer safety and best practices in the MPPD.
- Assist in the assessment of contacts between Officers and the public by reviewing procedures and interpersonal actions.

Scope & Methodology

Scope

The objective of this audit was to assess compliance with regulations and review relevant policies, procedures, and security controls, as required by Minnesota Statute 13.825, subd. 9.

Our scope covered related activities from January 1, 2024, to December 31, 2025. Audit criteria included:

- MN State Statute 13.825 (Portable Recording Systems)
- MN State Statute 626.553, subd. 2 (Discharge Firearm; Kill animal)
- MN State Statute 609.02, subd. 7(a) (Substantial Bodily Harm)

² *MPPD Body Worn Camera Policy*. https://www.minneapolisparcs.org/wp-content/uploads/2023/12/SO23-09-BWC-Policy.Final_.pdf (last accessed April 16, 2026).

- MN State Statute 13.82, subd. 17(a) (Protection of identities)
- MN State Statute 13.82, subd. 7 (Criminal Investigative Data)
- MN State Statute 13.43, subd. 2(5) (Public Data)
- MN State Statute 138.17 (Government Records; Administration)
- MN State Statute 13.05 (Data Protection)
- MN State Statute 626.8473 (Portable Recording Systems Adoption; Written Policy Required)
- MN State Statute 13.08 (Civil Remedies)
- MN State Statute 13.055 (Disclosure of Breach in Security)
- *MPPD Body Worn Camera Policy*

Methodology

As a part of this review, we met with MPPD to gain an understanding of the BWC program. We requested, received, and reviewed relevant documentation. Additionally, we obtained direct access to Axon's Evidence.com to perform an independent review of BWC video and associated data.³ We evaluated whether:

- Data are collected, classified, and used as defined by MN Statute 13.825, subd. 2.
- BWC data are retained as defined by 13.825, subd. 3.
- BWC data access is limited in compliance with 13.825, subd. 4.
- The inventory of BWC is maintained in compliance with 13.825, subd. 5.
- Only agency issued BWC can be used to document officer activities in compliance with 13.825, subd. 6
- Written procedures must be in place to authorize access to non-public recordings via 13.825, subd. 7.
- BWC Data are shared with other law enforcement agencies as mandated by 13.825, subd. 8
- Proper notification to the Bureau of Criminal Apprehension within 10 days of obtaining new surveillance technology occurs in compliance with 13.825, subd. 10
- BWC vendors comply with United States Federal Bureau of Investigation Criminal Justice Information Services Division security policies in compliance with 13.825, subd. 11
- MPPD personnel are adhering to the policies and procedures that are defined for BWC operation.

³ We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Findings & Recommendations

Finding 1: Standard Operating Procedures

We reviewed the Minneapolis Park Police Evidence.com Authorization Procedures and noted that the procedures describe how user access is requested, approved, modified, and removed. However, the procedures do not include some steps for ongoing review of user access.

The procedures do not include the following:

- Requiring periodic review of Axon Evidence.com user activity logs and user access to confirm access remains appropriate.
- Addressing how shared or group accounts, if any, should be managed when access changes occur.

As a result, the procedures do not fully describe how user access is managed and reviewed over time.

Industry standards recommend organizations to establish, document, approve, communicate, apply, evaluate, and maintain policies and procedures for an information governance program, which is sponsored by leadership of the organization, and to review and update those policies and procedures at least annually.

The procedures are currently being performed. However, it has yet to be fully developed and formally approved.

Without fully documented and formally approved procedures, there is a risk that processes may not be consistently applied across MPPD. Staff may rely on procedures that are unofficial, outdated, or interpreted differently, which could weaken oversight of BWC access management.

Recommendation 1

We recommend that the MPPD management update the Evidence.com Authorization Procedures to include steps for ongoing review of user access. The procedures should address periodic review of Evidence.com user activity logs and user access to confirm access remains appropriate, and address management of shared or group accounts, if applicable.

Management Response Letter

Given the nature of this engagement as a compliance-focused audit, the finding noted in this report does not require a formal management response or the development of detailed management action plans. The items identified are presented for MPPD management's awareness and continued monitoring. Should management choose to implement any remediations based on the finding, such actions can be incorporated into routine operational processes at their discretion.



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Park & Recreation Board

Transmitted via email

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Jennifer B. Ringold

April 16, 2026

Dear City Auditor Robert Timmerman,

We are pleased to learn that the City of Minneapolis City Auditor's Office Audit Division has determined that the Minneapolis Park Police Department is compliant with the relevant Minnesota State Statutes concerning the use of Body-Worn Cameras (BWC). Thank you for completing the required BWC Audit for the Minneapolis Park Police Department. Minneapolis Park and Recreation Board staff have been very complimentary of the audit process. We appreciate the recommendation regarding our Standard Operating Procedures. Staff are reviewing the recommendation and will develop a course of action to address these concerns prior to the next biennial audit.

Sincerely,

Jennifer B. Ringold
Deputy Superintendent

2024



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