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**City of Rochester Police Department  
2026 Portable Recording System (PRS)  
Biennial Audit Summary  
May 1, 2026**

At the request of the City of Rochester Police Department (RPD), 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 Rochester Police Department's management and use of Portable Recording System technology, LOGIS has found the City of Rochester 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 Rochester Police Department Policy 438.7, BWC Media.</p> <p>Reviewed Axon evidence configuration settings and verified classification categories align with MN Statute 13.825.</p> <p>RPD uses 4 classes of data classification:</p> <ol style="list-style-type: none"> <li>1. <b>Non-Evidence/General</b> – Recordings of police-citizen contact that did not lead to citation, report or arrest</li> <li>2. <b>Arrest/Citation/Report</b> – Recordings that have an associated arrest, citation or report</li> <li>3. <b>Complaint/Litigation</b> – Recordings that have generated a citizen or internal complaint or investigation</li> <li>4. <b>Permanent File</b> – Recordings that are associated with a death investigation or officer involved shooting.</li> </ol>	RPD data is properly classified and meets the requirements set forth by MN Statute §13.825 Subdivision 2





<p>§13.825 Subdivision 3</p>	<p>Data Retention</p>	<p>Reviewed Rochester Police Department Policy 438.8, Retention of BWC Media.</p> <p>All BWC data is retained for a minimum period of 3 years unless otherwise specified by RPDs retention settings. RPD defines 4 classes of data and the associated retention period:</p> <ol style="list-style-type: none"> <li>1. <b>Non-Evidence/General</b> - 3 years</li> <li>2. <b>Arrest/Citation/Report</b> - 15 years</li> <li>3. <b>Complaint/Litigation</b> - until manually deleted</li> <li>4. <b>Permanent File</b> - until manually deleted</li> </ol> <p>Reviewed Axon evidence configuration settings and verified retention durations align with MN Statute 13.825.</p>	<p>RPD data retention schedules meet the retention requirements set forth by MN Statute §13.825 Subdivision 3</p>
<p>§13.825 Subdivision 4</p>	<p>Access by data subjects</p>	<p>Reviewed Rochester Police Department Policy 438.7.1, Access and Use of BWC Media.</p> <p>Verified RPD policy and procedures updated with 2025 requirement for unredacted data from all PRS systems be provided to persons entitled to a report of a collision.</p> <p>Persons can complete and submit a Data Request Form to gain access to non-restricted PRS data.</p> <p>Data subject(s) must also provide identification if they are requesting private data.</p>	<p>RPD data request processes and policies meet the data access requirements set forth by MN Statute §13.825 Subdivision 4</p>



Statute Subdivision	Control Objective	Testing Procedure	Testing Result
§13.825 Subdivision 5	Inventory of PRS technology	<p>Reviewed Rochester Police Department Policy 438.8, Retention of BWC Media.</p> <p>RPD maintains 170 Axon Body 4 cameras in inventory which are all assigned to a specific individual, with a few as spare cameras.</p> <p>RPD provided screen capture showing daily log of deployed devices.</p> <p>RPD provided screen capture of the total amount of data stored.</p>	RPD camera inventory meets the requirements set forth MN Statute §13.825 Subdivision 5
§13.825 Subdivision 6	Use of agency-issued devices	Reviewed Rochester Police Department Policy 438.4, BWC Use.	RPD 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	<p>Reviewed Rochester Police Department Policy 438.7.1, Access and Use of BWC Media.</p> <p>Reviewed Axon user roles and permissions align with RPD policy.</p>	RPD policy for authorizing access to PRS data and devices meets the requirements set forth MN Statute §13.825 Subdivision 7





Statute Subdivision	Control Objective	Testing Procedure	Testing Result
§13.825 Subdivision 8	Sharing among agencies	Reviewed Rochester Police Department Policy 438.7.6, Access by Other Law Enforcement Agencies and Government Entities.	RPD policy for sharing PRS data with other law enforcement agencies meets the requirements set forth MN Statute §13.825 Subdivision 8
§13.825 Subdivision 9	Biennial audit	Reviewed Rochester Police Department Policy 438.3.1, BWC Coordinator Responsibilities.  Reviewed MN Legislative Reference Library for past audits.	RPD policy for conducting biennial audits of PRS systems meets the requirements set forth MN Statute §13.825 Subdivision 9.  The last PRS Audit for RPD was 2022, which caused a 4-year gap in audits.
§13.825 Subdivision 10	Notification to the Bureau of Criminal Apprehension	Reviewed Rochester Police Department Policy 438.3.1, BWC Coordinator Responsibilities.	RPD policy for notification of PRS system changes to BCA meets the requirements set forth in MN Statute §13.825 Subdivision 10





§13.825 Subdivision 11	PRS Vendor	RPD currently uses Axon Body 4 firmware version v1.2540.38.	RPD is using the latest firmware release and meets the requirements set forth in MN Statute §13.825 Subdivision 11
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The findings in the Portable Recording System Audit are impartial and based on information and documentation provided by the City of Rochester Police Department and examined by LOGIS Information Security staff and management. It demonstrates that the security, public accountability, and administration of the Rochester 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 May 1, 2026.

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Blake Tyra  
Local Government Information Systems, Information Security Specialist

A handwritten signature in black ink, appearing to read "Jim Franklin", written over a horizontal line.

Jim Franklin  
Chief of Police, Rochester Police Department

Respectfully submitted to the following:

Jim Franklin, Chief of Police, Rochester Police Department  
Legislative Law Library  
Judiciary Finance and Civil Law (Rep. Liebling 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)

