



Audit of the Cincinnati/Northern Kentucky
Airport Police Department's Fiscal Years
2023 and 2024 Equitable Sharing Program
Receipts and Disbursements,
Hebron, Kentucky



AUDIT DIVISION

25-093

September 2025



EXECUTIVE SUMMARY

Audit of the Cincinnati/Northern Kentucky Airport Police Department's Fiscal Years 2023 and 2024 Equitable Sharing Program Receipts and Disbursements, Hebron, Kentucky

Objective

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) has completed an audit to assess whether funds received by the Cincinnati/Northern Kentucky Airport Police Department (CVG PD) through the DOJ Equitable Sharing Program were accounted for properly and used for permissible purposes as defined by applicable regulations and guidelines. This audit covered January 1, 2023, through December 31, 2024.

Results in Brief

Our audit concluded that the CVG PD accounted for and used its DOJ equitable sharing funds in accordance with the equitable sharing guidance. However, we found that the CVG PD did not ensure vendors for all qualified purchases are registered in SAM.gov and are not suspended or debarred from doing business with the federal government. We also found that the CVG PD did not have adequate property management controls for equipment purchased with equitable sharing funds.

Recommendations

Our report includes two recommendations to assist the DOJ Criminal Division (Criminal Division), which oversees the DOJ Equitable Sharing Program. We requested a response to our draft audit report from the CVG PD and the Criminal Division, which can be found in Appendices 2 and 3, respectively. Our analysis of those responses is included in Appendix 4.

Audit Results

This audit covered the CVG PD's fiscal years 2023 and 2024. The CVG PD began the audit period with a balance of \$3,377,484. Between January 2023 and December 2024, the CVG PD received \$1,416,307 and spent \$918,605 in equitable sharing funds, primarily on law enforcement equipment and training.

We found that the CVG PD accounted for the DOJ equitable sharing funds received during the audit period—the funds were deposited into a separate bank account, and all DOJ equitable sharing activity was tracked by separate codes in the accounting records. We also found that the CVG PD used DOJ equitable sharing funds for permissible purposes and its expenditures were adequately supported. However, we found deficiencies in CVG PD's internal controls for vendor registration and property management.

Vendor Registration

The CVG PD did not ensure that vendors for all qualified purchases are registered in SAM.gov and are not suspended or debarred prior to making a purchase using DOJ equitable sharing funds. This non-compliance puts equitable sharing funds at risk of being spent with vendors who are prohibited from doing business with the government.

Inventory Control and Tracking

The CVG PD did not maintain complete property records in accordance with federal requirements, which includes ensuring records contain certain information such as the source of funding. In addition, the CVG PD did not conduct a physical inventory every 2 years, as required.

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Introduction

The Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of the equitable sharing funds received and spent by the Cincinnati/Northern Kentucky Airport Police Department (CVG PD) in Hebron, Kentucky. The objective of the audit was to assess whether funds received by the CVG PD through the Equitable Sharing Program were accounted for properly and used for permissible purposes as defined by applicable regulations and guidelines. The audit covered January 2023 through December 2024.¹ The CVG PD began the audit period with a DOJ equitable sharing funds balance of \$3,377,484. Between January 2023 and December 2024, the CVG PD received \$1,416,307 and spent \$918,605 in equitable sharing revenues as a participant in the DOJ Equitable Sharing Program.

DOJ Equitable Sharing Program

The Comprehensive Crime Control Act of 1984 authorized the implementation of the DOJ Asset Forfeiture Program (Asset Forfeiture Program). The Guide to Equitable Sharing for State, Local, and Tribal Law Enforcement Agencies (Equitable Sharing Guide) states the Asset Forfeiture Program is a nationwide law enforcement initiative that removes the tools of crime from criminal organizations, deprives wrongdoers of the proceeds of their crimes, recovers property that may be used to compensate victims, and deters crime. A key element of the Asset Forfeiture Program is the Equitable Sharing Program.² The DOJ Equitable Sharing Program allows any state or local law enforcement agency that directly participated in an investigation or prosecution resulting in a federal forfeiture to request a portion of federally forfeited cash, property, and proceeds.

Although several DOJ agencies are involved in various aspects of the seizure, forfeiture, and disposition of equitable sharing revenues, three DOJ components work together to administer the Equitable Sharing Program—the United States Marshals Service (USMS), the Justice Management Division (JMD), and the Criminal Division’s Money Laundering and Asset Recovery Section (MLARS). The USMS is responsible for transferring asset forfeiture funds from DOJ to the receiving state or local agency. JMD manages the Consolidated Asset Tracking System, a database used to track federally seized assets throughout the forfeiture life cycle. Finally, MLARS tracks membership of state and local participants, updates the Equitable Sharing Program rules and policies, and monitors the allocation and use of equitably shared funds.

State and local law enforcement agencies may receive equitable sharing funds by participating directly with DOJ agencies on investigations that lead to the seizure and forfeiture of property, or by seizing property and requesting one of the DOJ agencies to adopt the seizure and proceed with federal forfeiture. Once the seized assets are forfeited, the assisting state and local law enforcement agencies can request a share of the forfeited assets, or a percentage of the proceeds derived from the sale of forfeited assets. Generally, the degree of a state or local agency’s direct participation in an investigation determines the equitable share allocated to that agency.

¹ CVG PD’s fiscal year begins January 1 and ends December 31.

² The U.S. Department of the Treasury also administers a federal asset forfeiture program, which includes participants from Department of Homeland Security components. This audit was limited to equitable sharing revenues received through the DOJ Equitable Sharing Program.

To request a share of seized assets, a state or local law enforcement agency must first become a member of the DOJ Equitable Sharing Program. Agencies become members of the program by signing and submitting an annual Equitable Sharing Agreement and Certification report to MLARS. As part of each annual agreement, officials of participating agencies certify that they will use equitable sharing funds for permissible law enforcement purposes. The Equitable Sharing Guide outlines categories of permissible and impermissible uses for equitable sharing funds and property.

Cincinnati/Northern Kentucky Police Department and Airport Board

The CVG PD is located in Hebron, Kentucky, on the property of the Cincinnati/Northern Kentucky International Airport, which spans more than 7,000 acres. In 2024, 9.2 million travelers passed through the airport. As of February 2025, the CVG PD had a workforce of 49 sworn officers and 23 civilian employees. While the CVG PD is the participant in the DOJ Equitable Sharing Program, the Cincinnati/Northern Kentucky Airport Board (Airport Board) has jurisdiction, control, possession, and supervision of the airport. As part of that role, the Airport Board functions as the governing body of the CVG PD, and the Airport Board's Accounting Division handles the CVG PD's accounting activities, including the recording of equitable sharing receipts and expenditures, processing invoices for payment, and financial reporting. Throughout the report, we use the Airport Board to refer to the Airport Board's Accounting Division.

OIG Audit Approach

We tested the CVG PD's compliance with what we considered to be the most important financial management conditions of the DOJ Equitable Sharing Program to assess whether it accounted for equitable sharing funds properly and used such revenues for permissible purposes. Unless otherwise stated, we applied the Equitable Sharing Guide—which sets forth the policies applicable to the program, including for the proper use of and accounting for equitable sharing assets—as our primary criteria.³ To conduct the audit, we tested the CVG PD's compliance with the following:

- **Accounting for equitable sharing resources** to determine whether standard accounting procedures were used to track equitable sharing assets, including cash receipts.
- **Use of equitable sharing resources** to determine if equitable sharing cash was used for permissible law enforcement purposes.

See Appendix 1 for more information on our objective, scope, and methodology.

³ In March 2024, MLARS updated the Equitable Sharing Guide. The previous Equitable Sharing Guide had been issued in July 2018. Because our scope included financial activity between January 2023 and December 2024, we used both versions of the Equitable Sharing Guide in conducting our audit. Our audit did not include assessing the operational activities that resulted in the CVG PD sharing in the forfeited assets.

Audit Results

Accounting for Equitable Sharing Receipts

The Equitable Sharing Guide requires that law enforcement agencies use standard accounting procedures and internal controls to track equitably shared funds and items purchased with shared funds. This includes establishing a separate revenue account or accounting code for DOJ equitable sharing program proceeds. In addition, agencies must deposit any interest income earned on equitable sharing funds in the same revenue account or under the accounting code established solely for the shared funds. Further, law enforcement agencies participating in the Equitable Sharing Program are required to use the eShare portal.⁴

As mentioned previously, the Airport Board handles all accounting responsibilities for the CVG PD and uses the Airport Board's official accounting software to track DOJ equitable sharing fund financial activities. We confirmed that the Airport Board established a separate bank account for the deposit of DOJ equitable sharing funds. We also confirmed that the Airport Board used separate accounting codes to track the receipt of DOJ equitable sharing funds, the interest income earned on such revenues, and the expenditure of such funds. We determined that during our scope, CVG PD received DOJ equitable sharing revenues totaling \$1,416,307, which reconciled to the amount recorded by MLARS.

We reviewed a sample of 10 DOJ equitably shared receipts totaling \$292,701 and found that these funds were properly accounted for and deposited into the bank account established for DOJ equitable sharing funds. Additionally, all interest income earned on equitable sharing funds occurred within the same bank account established for DOJ equitable sharing funds, and the interest income earned was recorded to the appropriate accounting code.

In addition to properly accounting for equitable sharing funds, including interest income earned, the Equitable Sharing Guide lists 12 other accounting procedures and controls that participating agencies are required to follow. We found that the Airport Board complied with all but two of these additional requirements, which pertain to vendor registration and property management and tracking; these areas of non-compliance are discussed in the following sections of this report.

Vendor Registration

According to the Equitable Sharing Guide, participants are required to ensure vendors for all qualified purchases are registered in SAM.gov and are not suspended or debarred.⁵ After reviewing the CVG PD's and Airport Board's policies and procedures, we found no mention of conducting this verification, as well as no evidence that the Airport Board or the CVG PD had queried SAM.gov prior to approving purchases. An Airport Board official confirmed that the Airport Board had not queried SAM.gov prior to approving DOJ

⁴ The eShare portal enables a participating agency to view the status of its equitable sharing requests and distributions made by DOJ.

⁵ According to the U.S. General Services Administration, the suspension and debarment process protects the federal government from fraud, waste, and abuse by using several tools to avoid doing business with non-responsible vendors. Suspensions are limited to less than 12 months, for an immediate need, and usually used pending the completion of investigation or legal proceeding. Debarments are usually 3 years in length and are usually based on a legal conviction.

equitable sharing purchases because the Airport Board was not aware of the requirement. However, this official stated that for procurements using federal dollars, the Airport Board does require prospective contractors to provide a certification statement that they are not suspended or debarred when submitting their bids. We identified the CVG PD's qualifying purchases and confirmed that those purchases involved vendors that were registered on SAM.gov and were not suspended or debarred. Nonetheless, without procedures to verify vendor suspension and debarment status for all DOJ equitable sharing expenditures, the Airport Board and the CVG PD, by extension, are at risk of conducting business with vendors that are excluded from doing business with the government due to a history of violations, such as failure to perform, false statements, or fraud. Therefore, we recommend that the Criminal Division ensure that the CVG PD, in conjunction with the Airport Board, updates procurement policies and procedures to verify vendors for all qualified purchases are registered in SAM.gov and are not suspended or debarred.

Inventory Control and Tracking

The Equitable Sharing Guide requires agencies to develop inventory controls that comply with the applicable provisions of the Office of Management and Budget's (OMB) Uniform Administrative Requirements, Costs, Principles, and Audit Requirements for Federal Awards (Uniform Guidance). According to the Uniform Guidance, regardless of whether equipment is acquired in part or its entirety with federal funds, the agency must maintain property records that include specific elements, such as a description of the property and the funding source. Additionally, the agency must conduct a physical inventory of the property at least once every 2 years.

We reviewed the Airport Board's Fixed Asset Policy and determined that it does not fully cover all Uniform Guidance requirements, such as tracking the funding source of assets and location of the assets. As a result, the CVG PD's asset inventory records did not track all the elements required by the Uniform Guidance. We also noted that the Fixed Asset Policy did not include a requirement to conduct a physical inventory. Although we did not identify any instances where the purchased tangible property we tested was missing, the deficiencies we identified with CVG PD's procedures and the Fixed Asset Policy present a risk that any theft, loss, damage, or disposal of property goes unaccounted. We discussed these issues with CVG PD officials, and they told us that they were not fully aware of the Uniform Guidance requirements and acknowledged a need to take corrective action. We recommend that the Criminal Division ensure that the CVG PD, in conjunction with the Airport Board, updates the property management policies and processes to fully comply with OMB's Uniform Guidance requirements, and that the CVG PD updates its equitable sharing property records based upon those requirements.

Equitable Sharing Resources

The Equitable Sharing Guide requires that equitable sharing funds or tangible property received by state and local agencies be used for law enforcement purposes that directly supplement, rather than supplant, the appropriated resources of the recipient law enforcement agency. The Equitable Sharing Guide defines permissible uses (e.g., law enforcement equipment and training) and impermissible uses (e.g., loans and purchase of food and beverages) of the funds. In addition, state and local law enforcement agencies must retain all documents and records pertaining to their participation in the DOJ Equitable Sharing Program for a period of at least 5 years.

Use of Equitable Sharing Funds

According to its accounting records, the CVG PD expended DOJ equitable sharing funds totaling \$202,986 in FY 2023 and \$715,619 in FY 2024, for a total of \$918,605. The CVG PD primarily used these funds to purchase law enforcement equipment, such as vehicles and service weapons, and training. We judgmentally selected and tested 26 transactions totaling \$261,483, or over 25 percent of the total funds expended in the period we reviewed, to determine if the expenditures of DOJ equitable sharing funds were permissible and supported by adequate documentation. The transactions in our sample included expenditures for equipment, training, travel, and law enforcement operations. Based upon our review of the supporting documentation provided by the CVG PD, we determined that the sampled expenditures were supported by adequate documentation and were used for appropriate purposes as outlined in the Equitable Sharing Guide.

Supplanting

The Equitable Sharing Guide requires that shared resources be used to increase or supplement the resources of the recipient agency and prohibits the use of shared resources to replace or supplant the appropriate resources of the recipient. In other words, the recipient agency must benefit directly from the equitable sharing funds. To test whether equitable sharing funds were used to supplement rather than supplant local funding, we interviewed local officials, as well as reviewed the total budgets for the Airport Board and the operational budgets for the CVG PD for Fiscal Years 2022 through 2024. Based on this work, as well as our transaction testing, we did not identify significant indication that the CVG PD used DOJ equitable sharing funds to supplant its budget.

Conclusion and Recommendations

We audited the CVG PD's compliance with what we considered to be the most important conditions of the DOJ Equitable Sharing Program to assess whether the CVG PD accounted for DOJ equitable sharing funds properly and used such revenues for permissible purposes. Overall, we found that the CVG PD, in coordination with the Airport Board, adequately accounted for its DOJ equitable sharing funds and used those funds for permissible uses identified in the Equitable Sharing Guide. However, we determined that the CVG PD did not fully comply with vendor registration confirmation and property management requirements. We provide two recommendations to the Criminal Division to address these deficiencies.

We recommend that the Criminal Division:

1. Ensure the CVG PD, in conjunction with the Airport Board, updates procurement policies and procedures to verify vendors for all qualified purchases are registered in SAM.gov and are not suspended or debarred.
2. Ensure the CVG PD, in conjunction with the Airport Board, updates the property management policies and processes to fully comply with OMB's Uniform Guidance requirements, and that the CVG PD updates its equitable sharing property records based upon those requirements.

APPENDIX 1: Objective, Scope, and Methodology

Objective

The objective of the audit was to assess whether the funds received by the Cincinnati/Northern Kentucky Airport Police Department (CVG PD) through the Equitable Sharing Program were accounted for properly and used for permissible purposes as defined by applicable regulations and guidelines.

Scope and Methodology

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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Our audit concentrated on, but was not limited to, equitable sharing receipts received and equitable sharing funds spent by the CVG PD between January 1, 2023, and December 31, 2024. Our audit was limited to equitable sharing revenues received through the Department of Justice (DOJ) Equitable Sharing Program. We tested compliance with what we considered to be the most important conditions of the DOJ Equitable Sharing Program. We reviewed laws, regulations, and guidelines governing the accounting for and use of DOJ equitable sharing receipts, including the Guide to Equitable Sharing for State, Local, and Tribal Law Enforcement Agencies.⁶ Unless, otherwise stated in our report, the criteria we audited against are contained in these documents.

We performed audit work at the CVG PD located in Hebron, Kentucky. We interviewed CVG PD and Cincinnati/Northern Kentucky Airport Board (Airport Board) officials and examined records, related revenues, and expenditures of DOJ equitable sharing funds. In addition, we relied on computer-generated data contained in eShare to identify equitably shared revenues to the CVG PD during the audit period. We did not establish the reliability of the data contained in eShare as a whole. However, when viewed in context with other available evidence, we believe the opinions, conclusions, and recommendations included in this report are valid.

Our audit specifically evaluated CVG PD's compliance with two essential equitable sharing guidelines: (1) accounting for equitable sharing receipts, and (2) the use of equitable sharing funds. In planning and performing our audit, we considered internal controls over DOJ equitable sharing receipts established and used by the CVG PD. However, we did not assess the reliability of the Airport Board's financial management system, or the extent to which the financial management system complied with internal controls, laws, and regulations overall. Moreover, as part of our audit, we reviewed the Single Audit Report for the fiscal year

⁶ As noted earlier in this report, MLARS updated the Equitable Sharing Guide in March 2024. The previous Equitable Sharing Guide had been issued in July 2018. Because our scope spans January 2023 through December 2024, we referred to both versions of the Equitable Sharing Guide in conducting our audit.

ended December 31, 2023, of the Airport Board and determined that it did not contain any findings relevant to our audit.⁷

In the scope of this audit, the CVG PD had 200 cash receipts totaling \$1,416,307 and expended \$918,605 in DOJ equitable sharing funds. We judgmentally selected and tested a sample of 10 receipts totaling \$292,701 and a sample of 26 expenditures totaling \$261,483. A judgmental sampling design was applied to capture several aspects of the disbursements reviewed, such as dollar amounts and expense categories. This non-statistical sample design does not allow projection of the test results to all disbursements.

We discussed the results of our review with officials from the CVG PD and Airport Board throughout the audit and at a formal exit conference. As appropriate, their input has been included in the relevant sections of the report.

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objective. We did not evaluate the internal controls of the CVG PD to provide assurance on its internal control structure as a whole. CVG PD management is responsible for the establishment and maintenance of internal controls in accordance with the Equitable Sharing Guide and Uniform Guidance. Because we do not express an opinion on the CVG PD's internal control structure as a whole, we offer this statement solely for the information and use of the CVG PD and the DOJ's Criminal Division.⁸

We assessed CVG PD management's design, implementation, and operational effectiveness of its internal controls. We reviewed the sufficiency of the CVG PD's policies and procedures to ensure compliance with the Equitable Sharing Guide requirements. We identified deficiencies that we believe could affect the CVG PD's ability to ensure compliance with equitable sharing program guidance and laws and regulations.

The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our review was limited to those internal control components and underlying principles that we found significant to the objective of this audit, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

⁷ Non-federal entities that receive federal financial assistance are required to comply with the Single Audit Act of 1984, as amended. The Single Audit Act requires recipients of federal funding above a certain threshold to receive an annual audit of their financial statements and federal expenditures. The audit is referred to as "single" because it includes all federal financial assistance that the entity has received and expended. Under the Uniform Guidance, such entities that expend \$1,000,000 or more in federal funds within the entity's fiscal year must have a single audit performed annually covering all federal funds expended that year. Prior to October 1, 2024, the threshold for single audit requirements was \$750,000.

⁸ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

APPENDIX 2: The Cincinnati/Northern Kentucky Airport Police Department's Response to the Draft Audit Report



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TO: United States Department of Justice
Office of the Inspector General
Audit Division

FROM: Kenton County Airport Board

DATE: September 18, 2025

RE: Response to Findings Presented Within the Draft Audit Report for the Audit of the Cincinnati/ Northern Kentucky Airport Police Department's Fiscal Year 2023 and Fiscal Year 2024 Equitable Sharing Program Receipts and Disbursements

We have reviewed the draft audit report on the Audit of the Cincinnati/Northern Kentucky Airport Police Department's Fiscal Year 2023 and Fiscal Year 2024 Equitable Sharing Program Receipts and Disbursements, Hebron, Kentucky. Two recommendations were presented within this draft report. We have included our official responses to these recommendations herein.

1. Ensure the CVG PD, in conjunction with the Airport Board, updates procurement policies and procedures to verify vendors for all qualified purchases are registered in SAM.gov and are not suspended or debarred.

We agree with the finding above.

We have implemented informal procedures to review active vendor registration within SAM.gov for all qualified purchases, retroactive to purchases since January 1, 2025. These procedures are anticipated to be formally documented and adopted within the Police Department's policies and procedures by the end of Q1 2026.

2. Ensure the CVG PD, in conjunction with the Airport Board, updates the property management policies and processes to fully comply with OMB's Uniform Guidance requirements, and that the CVG PD updates its equitable sharing property records based upon those requirements.

We agree with the finding above.

We have begun recording all equipment in the Police Department's computer aided dispatch and records management system, retroactive to purchases made since January 1, 2025. The software enables tracking of all fields required under Uniform Guidance, 2 CFR §200.313(d)(1)–(2), including: property description, serial or identification number (if available), funding source and percentage of KCAB participation, acquisition date, cost, location, use and condition, and disposition data (if applicable). A formal policy outlining this process, along with the related bi-annual inventory reconciliation, is expected to be documented and adopted by the end of Q4 2025.

We believe the corrective measures outlined above prevent recurrence of these findings. Our team remains committed to maintaining strong internal controls to ensure continued compliance and effective oversight.

APPENDIX 3: The Criminal Division's Response to the Draft Audit Report



U.S. Department of Justice

Criminal Division

Money Laundering and Asset Recovery Section

Washington, D.C. 20530

September 15, 2025

MEMORANDUM

TO: Todd Anderson, Regional Audit Manager
Chicago Regional Audit Office
Office of the Inspector General

FROM: Teresa Franklin, Program Manager *TF*
Program Management and Training Unit
Money Laundering and Asset
Recovery Section

SUBJECT: DRAFT AUDIT REPORT for the Cincinnati/Northern Kentucky Airport
Police Department's Equitable Sharing Program Activities.

In a memorandum dated September 10, 2025, your office provided a draft audit report for the Cincinnati/Northern Kentucky Airport Police Department (CVG PD), which includes actions necessary for closure of the audit report findings. The Money Laundering and Asset Recovery Section (MLARS) concurs with all findings and recommendations in the draft audit report.

Upon receipt of the final audit report, MLARS will work with CVG PD to correct all identified findings.

cc: Louise Duhamel, Assistant Director
Audit Liaison Group
Internal Revenue and Evaluation Office
Justice Management Division

Jessica Schmaus, Audit Liaison
U.S. Department of Justice
Criminal Division

Tracey A. Waters
Audit Liaison Group
Internal Revenue and Evaluation Office
Justice Management Division

APPENDIX 4: The Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Report

The U.S. Department of Justice Office of the Inspector General (OIG) provided a draft of this audit report to the Criminal Division's Money Laundering and Asset Recovery Section (MLARS) and the Cincinnati/Northern Kentucky Airport Police Department (CVG PD). MLARS's response is incorporated in Appendix 3, and the CVG PD's response is incorporated in Appendix 2 of this final report. In response to our draft audit report, MLARS concurred with our recommendations; as a result, the status of the audit report is resolved. In addition, the CVG PD agreed with both recommendations. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

Recommendations for the Criminal Division:

- 1. Ensure the CVG PD, in conjunction with the Airport Board, updates procurement policies and procedures to verify vendors for all qualified purchases are registered in SAM.gov and are not suspended or debarred.**

Resolved. MLARS concurred with our recommendation and stated in its response that it will work with the CVG PD to correct this finding. As a result, this recommendation is resolved.

The CVG PD agreed with our recommendation and stated in its response that it has implemented informal procedures to review active vendor registration within SAM.gov for all qualified purchases, retroactive to purchases since January 1, 2025. The CVG PD further stated that it anticipates that these procedures will be formally documented and adopted within its policies and procedures by the end of the 1st quarter of 2026.

This recommendation can be closed when we receive evidence that the CVG PD updated procurement policies and procedures to verify that vendors for all qualified purchases are registered in SAM.gov and are not suspended or debarred.

- 2. Ensure the CVG PD, in conjunction with the Airport Board, updates the property management policies and processes to fully comply with the Office of Management and Budget's (OMB) Uniform Guidance requirements, and that the CVG PD updates its equitable sharing property records based upon those requirements.**

Resolved. MLARS concurred with our recommendation and stated in its response that it will work with the CVG PD to correct this finding. As a result, this recommendation is resolved.

The CVG PD agreed with our recommendation and stated in its response that it has begun the process of recording all equipment in its records management system, retroactive to purchases made since January 1, 2025. The CVG PD also stated that the software enables the tracking of all elements required by OMB's Uniform Guidance, and that the CVG expects to have a formal policy outlining this process by the end of the 4th quarter of 2025.

This recommendation can be closed when we receive evidence that CVG PD updated the property management policies and procedures to fully comply with OMB's Uniform Guidance requirements, and that the CVG PD updated its equitable sharing property records based upon those requirements.