



OHIO AUDITOR OF STATE
KEITH FABER



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INDEPENDENT ACCOUNTANT'S REPORT

ReGeneration Middle School
Hamilton County
School Employees Retirement System
Plante & Moran, PLLC
3320 W. Market Street, Suite 300
Fairlawn, OH 44333

We have examined the census data, including the demographic data of employees' name, last four digits of the social security number, gender, and date of birth, as well as the pensionable compensation and contributions remitted to the School Employees Retirement System (SERS) as of June 30, 2024, and for the year then ended. ReGeneration Middle School, Hamilton County (the School) management is responsible for reporting complete and accurate census data to SERS in accordance with the requirements of Chapter 3309 of the Ohio Revised Code and rules established by SERS.

Our responsibility is to express an opinion on the census data as described above based on our examination. Our examination was conducted in accordance with attestation standards established by the AICPA and the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the census data as described above was reported to SERS in accordance with the requirements of Chapter 3309 of the Ohio Revised Code and rules established by SERS.

An examination involves performing procedures to obtain evidence about whether the census data was reported to SERS in accordance with the requirements of Chapter 3309 of the Ohio Revised Code and rules established by SERS. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the census data reported to SERS, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our qualified opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Our examination disclosed that the School contracted with six vendors that provide services which are common to the normal daily operations of the School; however, none of the contracted employees were enrolled in, or contributed to, SERS as required by chapter 3309 of the Ohio Revised Code. The School was unable to provide a list of the contracted employees and their compensation; however, we presume the omission is material due to the small number of the School's enrolled employees.

In our opinion, except for the material misstatement described in the preceding paragraph, the census data, including the demographic data of employees' name, last four digits of the social security number, gender,

and date of birth, as well as the pensionable compensation and contributions remitted to SERS, were reported to SERS in accordance with the requirements of Chapter 3309 of the Ohio Revised Code and rules established by SERS as of and for the year ended June 30, 2024.

In accordance with *Government Auditing Standards*, we are required to report all deficiencies that are considered to be significant deficiencies or material weaknesses in internal control; fraud and noncompliance with provisions of laws, regulations, contracts, or grant agreements that have a material effect on the accuracy and completeness of the census data and pensionable wages; and any other instances that warrant the attention of those charged with governance. We are also required to obtain and report the views of responsible officials concerning the findings, conclusions, and recommendations, as well as any planned corrective actions. We performed our examination to express an opinion on whether the census data was reported to SERS in accordance with the requirements of Chapter 3309 of the Ohio Revised Code and rules established by the School Employees Retirement System and not for the purpose of expressing an opinion on the internal control over the accuracy and completeness of the census data provided to the pension system, or on compliance and other matters; accordingly, we express no such opinions. Our examination disclosed a finding that is required to be reported under *Government Auditing Standards* and that findings, along with the views of responsible officials, are described in the attached Schedule of Findings.

This report is intended solely for the information and use of ReGeneration Middle School's management, those charged with governance, and School Employees Retirement System management, and plan auditors to provide assurances that the census data reported to the School Employees Retirement System is accurate and complete. This report is not suitable for any other purpose.



Keith Faber
Auditor of State
Columbus, Ohio
November 21, 2024

**REGENERATION MIDDLE SCHOOL
HAMILTON COUNTY**

**SCHEDULE OF FINDINGS
YEAR ENDED JUNE 30, 2024**

FINDING NUMBER 2024-001

Noncompliance / Material Weakness

By law, all non-teaching employees of Ohio's boards of education, school districts, vocational and technical schools, community schools, and community colleges are required to contribute to the School Employees Retirement System of Ohio (SERS) unless their position permits exemption from membership, optional membership, or exclusion from membership. Ohio Rev. Code §3309.23 requires individuals who meet the definition of "employee" as stated in section 3309.01(B) of the Revised Code to contribute to SERS with limited exceptions.

Ohio Rev. Code § 3309.01(B) includes the following definition for "Employee":

1. Any person employed by a public employer in a position for which the person is not required to have a registration, certificate, or license issued pursuant to section 3301.28 or sections 3319.22 to 3319.31 of the Revised Code or a permit issued under section 3319.0812 of the Revised Code;
2. Any person who performs a service common to the normal daily operations of an educational unit even though the person is employed and paid by one who has contracted with an employer to perform the service, and the contracting board or educational unit shall be the employer for the purpose of administering the provisions of this chapter.
3. Any person, not a faculty member, employed in any school or college or other institution wholly controlled and managed, and wholly or partially supported by the state of any political subdivision thereof, the board of trustees, or other managing body of which shall accept the requirements and obligations of this chapter.

In all cases of doubt, the school employees retirement board shall determine whether any person is an employee, as defined in this division, and its decision is final.

The School contracted with six vendors that provide services which are common to the normal daily operations of the School. However, none of the contract employees were enrolled in, or contributed to SERS. The School was unable to provide a list of the contracted employees or their earnings; however, due to the fact that the school only had nine employees enrolled in SERS, the omission of contracted employees is considered a material omission.

Management did not fully understand the requirements related to enrolling employees and reporting information to the applicable retirement system.

We recommend the School consult with the School Employees Retirement System of Ohio in all cases where there is uncertainty regarding whether a contracted employees is required to be enrolled in, and contributed to SERS.

Management's Response: The School lacks any control over the employment practices used by the aforementioned vendors. Each is a contracted business who uses its own employees to complete any of the prescribed services to the School. The School has no authority to force each vendor to provide its confidential payroll records in order to comply with this piece of legislation.

The School understands the Ohio Revised Code, and administration will strive for compliance with the legislation in future contracts.

OHIO AUDITOR OF STATE KEITH FABER



REGENERATION MIDDLE SCHOOL SCHOOL EMPLOYEES RETIREMENT SYSTEM CENSUS DATA EXAMINATION

HAMILTON COUNTY

AUDITOR OF STATE OF OHIO CERTIFICATION

This is a true and correct copy of the report, which is required to be filed pursuant to Section 117.26, Revised Code, and which is filed in the Office of the Ohio Auditor of State in Columbus, Ohio.



Certified for Release 11/26/2024

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This report is a matter of public record and is available online at
www.ohioauditor.gov