



OHIO AUDITOR OF STATE
KEITH FABER



OHIO AUDITOR OF STATE KEITH FABER



65 East State Street
Columbus, Ohio 43215
ContactUs@ohioauditor.gov
800-282-0370

INDEPENDENT ACCOUNTANT'S REPORT

ReGeneration Middle School
Hamilton County
State Teachers Retirement System
Crowe LLP
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, as well as the pensionable compensation and contributions remitted to the State Teachers Retirement System (STRS) 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 STRS in accordance with the requirements of Chapter 3307 of the Ohio Revised Code and rules established by STRS.

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 STRS in accordance with the requirements of Chapter 3307 of the Ohio Revised Code and rules established by STRS.

An examination involves performing procedures to obtain evidence about whether the census data was reported to STRS in accordance with the requirements of Chapter 3307 of the Ohio Revised Code and rules established by STRS. 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 STRS, 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 two 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, STRS as required by chapter 3307 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, as well as the pensionable compensation and contributions remitted to STRS, were reported to STRS in accordance with the requirements of Chapter 3307 of the Ohio Revised Code and rules established by STRS 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 STRS in accordance with the requirements of Chapter 3307 of the Ohio Revised Code and rules established by the State Teachers 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 State Teachers 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 teaching employees of Ohio's boards of education, school districts, vocational and technical schools, community schools, universities, and colleges are required to contribute to the State Teachers Retirement System (STRS) unless their position permits exemption from membership, optional membership, or exclusion from membership. Ohio Rev. Code §3307.26 requires individuals who meet the definition of "Teacher" as stated in section 3307.01(B) of the Revised Code to contribute to STRS with limited exceptions.

Ohio Rev. Code § 3307.01(B) includes the following definition for "Teacher":

1. Any person paid from public funds and employed in the public schools of the state under any type of contract described in section 3311.77 or 3319.08 of the Revised Code in a position for which the person is required to have a license or registration issued pursuant to sections 3319.22 to 3319.31 of the Revised Code;
2. Except as provided in division (B)(2)(b) or (c) of this section, any person employed as a teacher or faculty member in a community school or a science, technology, engineering, and mathematics school pursuant to Chapter 3314. or 3326. of the Revised Code;
3. Any person having a license or registration issued pursuant to sections 3319.22 to 3319.31 of the Revised Code and employed in a public school in this state in an educational position, as determined by the department of education and workforce, under programs provided for by federal acts or regulations and financed in whole or in part from federal funds, but for which no licensure requirements for the position can be made under the provisions of such federal acts or regulations;
4. Any other teacher or faculty member employed in any school, college, university, institution, or other agency wholly controlled and managed, and supported in whole or in part, by the state or any political subdivision thereof, including Central state university, Cleveland state university, and the university of Toledo
5. The educational employees of the state board of education, as determined by the state superintendent of public instruction, and the educational employees of the department of education and workforce, as determined by the director of education and workforce
6. Any person having a registration issued pursuant to section 3301.28 of the Revised Code and employed as a tutor by the coordinating service center as defined in that section
7. Any person having a license issued pursuant to Chapter 4732. of the Revised Code and employed as a school psychologist in a public school

8. Any person having a pre-service teacher permit issued pursuant to section 3319.0812 of the Revised Code and employed as a substitute teacher by a school district or school.

In all cases of doubt, the state teachers retirement board shall determine whether any person is a teacher, and its decision shall be final.

The School contracted with two vendors that provide services which include positions that require membership in STRS in accordance with Ohio Rev. Code §3307.26 as described above. However, these contract employees were neither enrolled in, nor contributed to STRS. The School was unable to provide a list of contract employees or their earnings; however, due to the fact that the school omitted both contracted employees it 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 State Teachers Retirement System in all cases where there is uncertainty regarding whether contracted employees are required to be enrolled in, and contribute to STRS.

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 STATE TEACHERS 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

65 East State Street, Columbus, Ohio 43215
Phone: 614-466-4514 or 800-282-0370

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