



STATE TEACHERS
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OF OHIO

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May 2, 2018

Ms. Bethany Rhodes
Director/General Counsel
Ohio Retirement Study Council
30 E. Broad St., 2nd Floor
Columbus, OH 43215

Dear Ms. Rhodes:

Thank you for the opportunity to comment on ORSC staff's recommendation to impose statutory caps on the penalties STRS Ohio imposes for late submission of contributions and reports by employers. We agree in concept with staff's proposal regarding the cap on penalties. As ORSC staff indicated to us, their recommendation involves only penalties and is not a recommendation to limit STRS Ohio's current statutory authority to charge interest on late contributions. We look forward to working with you on specific language to implement this change.

Please let me know if you would like to discuss this issue further.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Nehf", written over a faint, larger version of the same signature.

Michael J. Nehf
Executive Director