New York State Comptroller
THOMAS P. DiNAPOLI

# DeRuyter Central School District

## Lead Testing and Reporting

**S9-25-4 | June 2025**

**Division of Local Government and School Accountability**

# Contents

# Audit Results

## DeRuyter Central School District

| Audit Objective | Audit Period |
| --- | --- |
| Did DeRuyter Central School District (District) officials identify, report and implement needed remediation to reduce lead exposure in potable water outlets? | July 1, 2019 – September 30, 2024 |

### Understanding the Program

Lead is a metal that was commonly used in plumbing and has since been identified as toxic to people, especially young children. Lead poisoning can cause neurological issues such as slowing children's growth, causing learning and behavioral issues or causing hearing and speech problems which can lead to greater difficulty performing well in school and beyond.[1] To aid in combating lead poisoning, New York State (NYS) requires all public school districts and Boards of Cooperative Educational Services (BOCES) to test potable (i.e., consumable) water for lead, report the results and implement necessary remediation. Testing and reporting for lead contamination began in 2016, and subsequent testing cycles have followed:

- Cycle One: September 6, 2016 to October 31, 2016.
- Cycle Two: January 1, 2020 to December 31, 2020 (extended to June 30, 2021 due to the COVID-19 pandemic).
- Cycle Three: January 1, 2023 to December 31, 2025.[2]

## Audit Summary

District officials did not properly identify, report or implement needed remediation to reduce lead exposure in all potable water outlets as required by NYS Public Health Law and Department of Health (DOH) regulations.[3] We determined 38 of the 180 (21 percent) water outlets we identified at select areas, that students, staff and the public may have access to and could consume water from, were not sampled or properly exempted by District officials during Cycle Two. This occurred because District officials did not have a sampling plan to identify all water outlets for sampling or exemption.

1 Lead Exposure Symptoms and Complications – https://www.cdc.gov/lead-prevention/symptoms-complications/index.html

2 As of December 22, 2022, schools are now required to test for lead in the water every three years beginning January 1, 2023 for Cycle Three.

3 Public Health Law section 1110; 10 NYCRR subpart 67-4 – Lead Testing in School Drinking Water

While the former Head of Buildings and Grounds did have a remedial action plan that showed which water outlets exceeded the lead action level and the remedial actions taken, it did not detail which water outlets they exempted from sampling and how they would be secured against use. Because there is no information on the lead levels of the 38 water outlets not sampled for testing, we were unable to determine whether officials identified and remediated all water outlets that would have required it.

Of the 112 water outlets the District sampled for Cycle Two testing, 29 water outlets exceeded the lead action level. We determined that eight of these 29 outlets (28 percent) with actionable lead levels were still in service without a test showing they were now below the lead action level or effective controls to prevent them from being used.

District officials did not report any results to the local health department as required, including lead action exceedances, and reported results through the DOH's Health Electronic Response Data System (HERDS) 245 days after the required reporting deadline. Additionally, District officials did not have any documentation to support that they notified staff, parents and/or guardians of the test results in writing, as required. Finally, the officials did not post the test results of their potable water outlet sampling on the District's website.

This final report includes eight recommendations to that effect. District officials agreed with our recommendations and have initiated or indicated they planned to initiate corrective action.

The Board of Education (Board) has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report must be prepared and provided to our office within 90 days, pursuant to Section 35 of the New York State General Municipal Law, Section 2116-a (3)(c) of the New York State Education Law and Section 170.12 of the Regulations of the Commissioner of Education. To the extent practicable, implementation of the CAP must begin by the end of the next fiscal year. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. The CAP should be posted on the District's website for public review.

# Lead Testing and Reporting: Findings and Recommendations

In accordance with NYS Public Health Law section 1110 and 10 NYCRR subpart 67-4 (regulations), all public school districts and BOCES (together "schools"), must test potable water outlets for lead contamination and take remedial action if the contamination exceeds the lead action level.[4] The regulations also established requirements for how and when schools must report their test results to local health departments, school staff, students' parents and/or guardians, DOH and NYS Education Department (NYSED), as well as the public. More details on the water outlet sampling, testing and reporting criteria used in this report, including testing cycles and DOH guidance, are included in Appendix A.

## Finding 1 – District officials did not ensure all required potable water outlets were sampled and tested for lead contamination for Cycle Two.

The District conducted initial water sampling on June 23 and 24, 2021 for Cycle Two testing, collecting samples from 112 of the District's water outlets, which were then tested at a laboratory certified through the NYS Environmental Laboratory Approval Program (ELAP). However, the District did not have a sampling plan to identify all water outlets for sampling. While the District had a remedial action plan that listed what remedial actions were planned or enacted, it did not detail which water outlets they exempted from sampling and how they would be secured against use.

We identified 180 water outlets at select areas throughout the District to determine whether the District conducted required sampling of all water outlets during Cycle Two.[5] Of the 180 water outlets we identified, 101 water outlets were included in the 112 water outlets sampled by the District for Cycle Two, and another 41 water outlets we observed as properly secured against use. Therefore, we determined that 38 of the 180 water outlets we identified were not exempted by the District and should have been sampled for testing (Figure 1).

**FIGURE 1: District Water Outlets We Identified That Were Not Sampled or Secured Against Use**

| | |
|---|---|
| **Water Outlets We Identified at Select Areas Throughout the District:** | **180** |
| **Less: Included in the District's Cycle Two Sampling:** | **(101)** |
| **Less: Observed as Properly Secured Against Use:** | **(41)** |
| **Total Water Outlets We Identified That Were Not Sampled or Secured Against Use:** | **38** |

4 We examined the Cycle Two testing period ending June 30, 2021, which had a lead action level of 15 parts per billion (ppb). Starting in Cycle Three the lead action level was lowered to five ppb. Schools should be aware that water outlets that were acceptable under the previous regulations could exceed the new lead action level and require remediation. Schools should account for this change in their sampling process and remediation efforts by prioritizing sampling water outlets that exceeded five ppb during the previous testing period.

5 See Appendix B for a complete list of water outlets we identified and their locations. See Appendix D for detailed information on our selection criteria for the water outlets selected.

The former Head of Buildings and Grounds told us he did not have a documented sampling plan because his sampling path would be easy to replicate. He described the path he took and told us it should be easy to follow because the chain of custody form for the lab report indicated the room numbers and the order in which the samples were collected. However, we were unable to follow this path to match sample and test results to specific outlets without assistance from the former Head of Buildings and Grounds.

Additionally, current District officials told us that the former Head of Buildings and Grounds performed sampling in 2021 without any supervision or review from other District officials to ensure all water outlets were sampled. Because District officials relied on the former Head of Buildings and Grounds to oversee the sampling and testing program without any supervision or review and the District did not have a sampling plan, District officials did not identify all water outlets required to be sampled for testing.

The District properly secured 41 water outlets against use by shutting off the outlets' water supply, signage (e.g., "Do Not Drink") and other physical or supervisory controls. However, because District officials did not identify all outlets to be sampled for testing, we were unable to determine whether the 38 unsampled or unsecured water outlets we identified were below the lead action level of 15 ppb.

For example, a sink in a science classroom, which we observed having beverageware close by, was never sampled and tested for lead contamination (Figure 2).

In addition, the former Head of Buildings and Grounds told us that he considered it unnecessary to sample the bottle fill stations that were attached to water fountains because the water fountains were sampled. However, the DOH guidance is explicit that a sample should be collected from both fixtures if they are used.

**FIGURE 2: Science Classroom Sink Not Sampled and Tested For Lead Contamination[a]**

a) Photo taken by OSC auditors in December, 2024 with permission of District officials.

Finally, we reviewed the test results for all 112 water outlets the District sampled and determined whether District officials took appropriate remedial actions for water outlets that exceeded the lead action level. Of the 112 water outlets that the District sampled and tested, 29 water outlets (26 percent) were above the lead action level of 15 ppb.

We determined that District officials did not perform any additional testing or remedial actions to bring the lead levels below the lead action level on the 29 water outlets. District officials told us they instead used controls to inform students and staff they should not drink from the

water outlets (e.g., a “Not for Drinking” sign) and added this information to the District’s remedial action plan. On December 24, 2024, we identified that eight of the 29 water outlets which exceeded the lead action level were in working order and did not have effective controls to prevent the outlets’ use, including two fountains near boys’ and girls’ locker rooms and a sink inside a bathroom attached to an elementary classroom with no controls in place to secure against use.

When we brought this issue to the attention of the District officials, they turned the water off to remove the two water fountains near the locker rooms from service and signs were placed for all three water outlets. Although signs can be used as a short-term control, the DOH guidance is explicit that to be considered an effective long-term control, signs need to be combined with other controls, such as continual education reinforcing to students and employees that the water outlet is not to be used or establishing and enforcing rules to prevent the water outlet’s use.

Because District officials relied on the former Head of Buildings and Grounds to oversee the lead testing program, they were not aware there was no detailed sampling plan and that not all water outlets were sampled as required. Additionally, since officials did not regularly review the controls put in place on water outlets that exceeded the lead action level, officials were unaware that the controls were not in place or were not effective to secure against use. Had District officials developed detailed sampling and updated their remedial action plan with a maintenance and monitoring schedule, District officials could have quickly reviewed the work performed by the former Head of Building and Grounds and determined whether all water outlets were sampled and if the controls implemented were still in place and effective.

## Recommendations

District officials should:

1. Develop sampling plans for all District water outlets that could be used for drinking and cooking.
2. Update the remedial action plan to include a maintenance and monitoring schedule detailing the water outlets exempt from sampling and how they are secured, which should be updated anytime conditions change, including when water outlets and controls are added or removed.
3. Sample all water outlets that could be used for drinking and cooking and properly secure any water outlets designated as exempt from sampling.
4. Remediate or implement effective long-term controls for all water outlets that exceed the lead action level.
5. Review all work related to the lead testing program for accuracy and completeness.

## Finding 2 – District officials did not report the results of the lead testing properly or in the required time periods.

District officials did not report all laboratory test results, including the initial sampling results showing 29 water outlets were above the lead action level, to all required parties or within the required time periods. This occurred because officials were not familiar with the reporting requirements and procedures were not in place to identify officials' duties or responsibilities. Specifically:

- The former Superintendent of Schools (Superintendent) did not notify the local health department directly for the results that exceeded the lead action level within one business day as required. Instead, the District only reported the results of all testing through HERDS 245 days late.
- District officials could not provide us with documentation that the former Superintendent notified staff, parents and/or guardians in writing about the water outlets that exceeded the lead action level. While current District officials told us they sent a letter to staff, parents and/or guardians notifying them of the water outlets that exceeded the lead action level, they could not find a record of sending the letter as an email or a physical letter.
- Although designated by the former Supervisor to do so, the former District Clerk did not post the results of all lead testing to the District website. After we brought this to their attention, current District officials posted the results to the website 165 weeks late.

District officials did not develop a sampling plan that properly addressed potable water outlet sampling, testing and reporting for lead contamination. Developing clear procedures identifying all officials involved and their roles and responsibilities may lower the risk that the District will miss reporting deadlines during future testing cycles.

## Recommendations

District officials should:

6. Develop procedures identifying all individuals involved in lead testing and reporting and their roles and responsibilities.
7. Notify all required parties in the required time periods after lead testing results are received.
8. Keep accurate records of all notification efforts performed.

# Appendix A: Profile, Criteria and Resources

## Profile

The District serves the Towns of Lincklaen and Otselic in Chenango County, the Town of Cuyler in Cortland County, the Towns of Cazenovia, DeRuyter, Georgetown and Nelson in Madison County, and the Town of Fabius in Onondaga County. The District's building is located in the Village of DeRuyter in the Town of DeRuyter.

The District is governed by an elected five-member Board. The Board is responsible for managing and controlling the District's financial and educational affairs. The Superintendent is responsible, along with other administrative staff, for managing the District's day-to-day operations under the Board's direction. During our audit period, there were two individuals who served as Superintendent: the former Superintendent who retired as of July, 31 2023 and the current Superintendent who started August 21, 2023.

The former Superintendent designated the former Head of Buildings and Grounds, who retired as of June 29, 2024, as the person responsible for the 2020-2021 reporting Cycle Two. The current Superintendent designated the current Head of Buildings and Grounds as the person responsible for coordinating and reporting all lead testing. The current Head of Buildings and Grounds has not completed the sampling or testing for reporting Cycle Three as of January 31, 2025.

## Criteria – Lead Testing and Reporting

To comply with DOH regulations, school officials should develop a sampling plan that properly addresses potable water outlet sampling, testing and reporting for lead contamination. Pursuant to Chapter 296 of the Laws of 2016, the first cycle of testing and reporting for lead contamination began in 2016, and subsequent testing cycles have followed:

- Cycle One: September 6, 2016 to October 31, 2016.
- Cycle Two: January 1, 2020 to December 31, 2020 (extended to June 30, 2021 due to the COVID-19 pandemic).
- Cycle Three: January 1, 2023 to December 31, 2025.

Sampling and Testing – Officials should identify all water outlets to be sampled, their location, and the order in which to collect samples. Water outlets may be located anywhere on school property including external water outlets. According to DOH guidance, the school's superintendent or their designee have the responsibility to identify which water outlets meet the regulation requirements for sampling. For any water outlets determined to fall outside the scope of the regulation, the school must have a remedial action plan that includes details on how those water outlets will not be accessed and/or used for drinking or cooking purposes and should be updated anytime conditions change. All samples must be sent to a laboratory certified by ELAP. When results from sampling of any fixture exceed the lead action

level, the water outlet must be immediately taken out of service until remediation is performed to reduce the lead levels to below the action level.

Reporting – School officials must report their testing and remedial action through DOH's HERDS reporting program, which reports the results of all potable water testing for lead contamination to local county health departments, DOH and NYSED. Importantly, if the school receives test results that show lead contamination exceeds the lead action level, school officials must report the exceedances directly to the local health department within one business day, and notify all school staff, parents, and guardians in writing within 10 days. School officials should coordinate with local health department officials ahead of the sampling and testing to confirm the health department's preferred method of reporting (e.g., email, an email and phone call, etc.) for test results that show lead contamination exceeds the lead action level. Finally, schools must post the results of all testing, including information about remedial actions taken, on their website.

To assist schools in their compliance with the regulations, the DOH developed the *Lead Testing in School Drinking Water Guidance Manual.*[6] The manual describes in detail how schools should develop and implement their lead testing program, including templates on assigning roles, staff, parent and/or guardian letters, posting results on school websites, as well as documenting and tracking remedial actions.

To ensure a school's lead testing program is successful, the school should identify and document which individuals will be responsible for the following:

- Who will be the main contact for the program?
- Who will create the sampling plan?
- Who will collect the samples?
- Who will coordinate with the laboratory and manage the test results?
- Who will perform remediation?
- Who will communicate the results to the public?
- Who will report the data and information to the local health department and enter it into the NYS DOH reporting application (HERDS)?
- Who will keep records?

All potable water outlets at a school that could be used for cooking or drinking should be tested for lead. Examples include:

- Combination bottle fill stations and drinking fountains (both the fountain and bottle fill nozzles should be tested),
- Classroom sinks,

6 https://www.health.ny.gov/environmental/water/drinking/lead/docs/leadtestinginschoolsguidancedocument.pdf

- Food washing sinks,
- Kitchen kettle filler outlets,
- Ice machines,
- Hand washing outlets, including those in bathrooms, and
- Athletic field outlets and any other sink known to be or potentially used for consumption.

Water outlets that are not going to be tested need to be listed on the remedial action plan and actions must be taken to properly secure them to prevent them from being used for cooking or drinking. Actions such as turning the water off at the outlet not only prevent access but also prevent the water outlet from being used at all. If a water outlet still needs to be used, the following are examples of controls that should be combined with each other to prevent use:

- Using physical controls such as locks or requiring special tools that prevent physical access to the water outlet,
- Regularly informing students and staff which water outlets are not to be used,
- Placing signs that say "Do not Drink, Non-Potable Water" or similar.[7] Signs must be clearly visible and in close proximity to the affected outlets. Placing a sign at a room entrance (i.e. lavatory entrance) is not acceptable.
- Establishing, and consistently enforcing, rules such as "No Eating or Drinking in the Science Lab."

These controls are only considered effective if they are used together. For example, signs can be removed due to vandalism or accidents, but if students and staff are regularly told that bathrooms are not to be used for drinking it would reduce the risk that someone may use a bathroom sink. The remedial action plan should be updated whenever there is a change, including when new water outlets are designated, or old ones are removed, new test results become available, additional remediation is planned or completed, or controls are added or removed. Additionally, a maintenance and monitoring schedule should help ensure remediation efforts are still operating effectively.

Schools must report the results of their lead testing to NYS agencies, their local county health department, staff, parents and/or guardians, as well as posting their results and remediation actions on their website. Timing always starts once the school receives the results and there are different notification and timing requirements if any results exceed the lead action level. The reporting requirements are as follows:

Results Exceed the Lead Action Level – The school must notify their local health department within one business day, and staff, parents and guardians in writing within 10 business days. Importantly, posting this information on the school's website or through social media does not qualify as notification in this case.[8]

7 For examples of signage, see page 12 of the DOH's Guidance Manual: https://www.health.ny.gov/environmental/water/drinking/lead/docs/leadtestinginschoolsguidancedocument.pdf#page=14

8 See page 14 of DOH's Guidance Manual: https://www.health.ny.gov/environmental/water/drinking/lead/docs/leadtestinginschoolsguidancedocument.pdf#page=16

After Any Testing is Done (Regardless of Whether Results Exceed the Lead Action Level) – The school must notify the DOH, NYSED, and their local county health department. Reporting is done through the HERDS system and must be done within 10 business days after results are received. School officials must post on their website the results of all their testing, including any remediation efforts performed or planned, within six weeks of receiving results.

Schools should keep all records related to their lead testing program for at least 10 years after document creation, and it is recommended that all such records be kept on-site in a centrally accessible repository.

Additional DOH resources, guidance and publications on lead in drinking water can be found at: https://health.ny.gov/environmental/water/drinking/lead/

In addition, our website can be used to search for other Lead Testing and Reporting audits: https://www.osc.ny.gov/local-government/audits

# Appendix B: District Water Outlets

**Figure 3: District Water Outlets We Identified That Were Not Sampled or Secured Against Use for Cycle Two by Location**

| Location | Water Outlets We Identified at Select Areas Throughout the District | Less: Included in the District's Cycle Two Sampling | Less: Observed as Properly Secured Against Use | Total Water Outlets We Identified That Were Not Sampled or Secured Against Use |
|---|---|---|---|---|
| **Hallways or Common Spaces** | 27 | (15) | (1) | 11 |
| **Bathroom** | 48 | (43) | 0 | 5 |
| **Elementary Classroom** | 20 | (15) | (5) | 0 |
| **Cafe/Kitchen/Food** | 12 | (4) | 0 | 8 |
| **Science or Art Room** | 43 | (23) | (19) | 1 |
| **Outside/Sports Areas** | 30 | (1) | (16) | 13 |
| **Totals** | **180** | **(101)** | **(41)** | **38** |

# Appendix C: Response From District Officials

**DeRuyter Central School**
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Phone: 315-852-3400 Fax: 315-852-9600
***Neal A. Capone, Ed.D.***
Superintendent of Schools

**Jenny Valente**
Director of Special Educatio
PK-4 Principal

**Stephen Rafferty**
5-12 Principal

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RE: DeRuyter Central School District
Lead Testing and Reporting
S9-25-4 2025 Audit - Response and Corrective Action Plan

To Dina M.L. Thompson, Chief of Municipal Audits,

The DeRuyter Central School District is in receipt of the report of the NYS Office of the State Comptroller's (OSC) audit entitled Lead Testing and Reporting, for the period covering July 1, 2019- September 30, 2024. The members of our School Board are aware of the contents of this letter and approved the continents therein. Additionally, a copy of this plan will be sent electronically to the NYS Education Department via NYSED portal and to OSC at caps@osc.state.ny.us.

The District concurs that the report is fair and accurate based on the information provided to the OSC during the audit. This audit presented unique challenges due to turnover in key personnel, with responsibilities now held by staff who are relatively new to their roles.

The District would like to note that the mitigating controls identified as missing during the audit were promptly corrected upon review, and the water fountains by the locker rooms are not the water fountains that we have in the main hallway by the large gym but instead are the older style fountains that the district believed nobody used. After it was brought to the district attention that a mitigating control was not in place for those fountains, we immediately implemented a mitigating control. The district has taken proactive steps to incorporate an educational component into our mitigating controls related to signage. Our 'Lead in Water Awareness' video will be finalized and available on the district website within the coming weeks. We have also established a plan to ensure that all staff and students participate in an annual review of the video as part of our ongoing awareness efforts. Additionally, all recommendations were addressed in a timely manner. As a result of this audit, the District is now better prepared, with clearly documented procedures in place to ensure continuity and minimize disruption in the event of future staff transitions during audits.

For each recommendation included in the audit report, the following is our corrective action(s) taken or proposed. The district has created a comprehensive Lead Testing Procedure Manual that outlines the process start to finish and addresses all of these recommendations.

***DeRuyter Central School*** = ***D****istrict* ***C****ommitted to* ***S****uccess*
***Board of Education:*** **Jodi Wiesing**, *President*; **Daniel Degear**, *Vice President*; *Members* – **Lisa Benedict, Connor Langevin, Dean Hathaway**

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Superintendent of Schools

**Recommendation # 1: Develop sampling plans for all District water outlets that could be used for drinking and cooking.**
The District has developed the *DeRuyter CSD Lead Testing Procedure Manual*, which outlines a comprehensive sampling plan. This manual provides a step-by-step process to ensure that all water outlets are tested in accordance with state regulations and requirements, ensuring timely compliance and consistency across all district buildings.

**Recommendation # 2: Update the remedial action plan to include a maintenance and monitoring schedule detailing the water outlets exempt from sampling and how they are secured, which should be updated anytime conditions change, including when water outlets and controls are added or removed.**
The *Lead Testing Procedure Manual* includes a detailed remedial action plan that outlines the maintenance and monitoring schedule for all water outlets. This plan specifies procedures for securing exempt outlets and assigns responsibility to the Head Custodian for ensuring updates are made whenever conditions change, such as when water outlets or controls are added or removed.

**Recommendation # 3: Sample all water outlets that could be used for drinking and cooking and properly secure any water outlets designated as exempt from sampling.**
The District has categorized all water outlets based on their intended use, creating an outlet inventory list that identifies which outlets will be sampled and which are exempt. Each exempt outlet is documented on the state-provided exemption form and includes justification, such as the presence of mitigating controls. Sampled outlets path of collection is mapped out on a district-wide sampling map, in accordance with the *Lead Testing Procedure Manual*.

**Recommendation # 4: Remediate or implement effective long-term controls for all water outlets that exceed the lead action level.**
The *Lead Testing Procedure Manual* details the remediation, maintenance, and long-term monitoring procedures for any outlets found to exceed the lead action level. The District uses the state-provided remediation form to document each remediated outlet and specify the method of remediation used. The use of this form is also noted in the *Lead Testing Procedure Manual*. Ongoing maintenance and monitoring of these outlets are conducted as outlined in the manual, with annual reviews by the Safety Committee to ensure all actions remain effective and compliant with regulatory requirements.

**Recommendation # 5: Review all work related to the lead testing program for accuracy and completeness.**
The *Lead Testing Procedure Manual* assigns oversight responsibilities to the District's Safety Committee, which annually reviews all aspects of the lead testing program. This includes the outlet inventory, exemption list, sampling list, chain of custody documentation, testing results, and the maintenance and monitoring schedule. The Head Custodian and School Business Executive are responsible for presenting this information to the committee to ensure accuracy and completeness.

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**Recommendation # 6: Develop procedures identifying all individuals involved in lead testing and reporting and their roles and responsibilities.**
The Procedure Manual includes a roles and responsibilities chart that clearly identifies each person involved in the lead testing program. This chart includes role descriptions, contact information, and backup personnel. Key roles include Program Lead, Sampling Plan Contact, Sample Collectors, Environmental Laboratory Liaison, Results Coordinator, Remediation Contact, HCS Coordinator, Reporting Contact, Public Communications Contact, and Recordkeeping Contact.

**Recommendation # 7: Notify all required parties in the required time periods after lead testing results are received.**
The district's lead procedure manual has a designated section for response to an action level exceedance section that shows the immediate response and what the school should do. This section designates what communication platforms will be dues to perform the notification and the timeline. There is also a sample letter in the appendix of the procedure manual that the district will use to communicate with families.

**Recommendation # 8: Keep accurate records of all notification efforts performed.**
The Procedure Manual includes recordkeeping guidelines that detail how all communication related to lead testing will be documented. All notifications are timestamped electronically and archived, with hard copies retained as a backup. The manual designates personnel responsible for maintaining these records to ensure thorough and accessible documentation of all notification efforts.

Respectfully,

Dr. Neal Capone
Superintendent of Schools

# Appendix D: Audit Methodology and Standards

We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law. We obtained an understanding of internal controls that we deemed significant within the context of the audit objective and assessed those controls. Information related to the scope of our work on internal controls, as well as the work performed in our audit procedures to achieve the audit objective and obtain valid audit evidence, included the following:

- We interviewed District officials and reviewed various records and reports to gain an understanding of the roles and responsibilities of the individuals involved in the process, and how individuals performed their duties during the Cycle Two period that closed June 30, 2021, and for Cycle Three which is still ongoing until December 31, 2025.
- We reviewed all available documentation that the District had for sampling and testing during Cycle Two that closed June 30, 2021, including District maps, laboratory chain of custody and result reports, and ELAP certifications. We supplemented this with our own observations of the District's current water outlets at the District building and the surrounding sport and event fields. We identified the following as high-risk areas/outlets based on the DOH guidance:
    - Hallway drinking fountains and bottle-filling stations, outside and sporting event areas, kitchens, cafeterias, and cooking classrooms, as they could affect large numbers of individuals at the District, including visitors.
    - Elementary classrooms, as they could affect young students who are particularly vulnerable to lead exposure.
    - Bathrooms, or other areas where individuals would be unsupervised and able to access water from faucets.
    - Art and Science classrooms, as they were specifically mentioned in DOH's guidance.

Using this information, we selected 180 water outlets, including all water outlets located in areas that we determined could have a high risk of affecting individuals at the District based on the DOH guidance.[9] We observed the controls present at each water outlet and whether they had been sampled for lead testing.

- For the 112 District-tested water outlets in Cycle Two, we identified 29 samples with results that exceeded the lead action level and determined whether District officials took appropriate remedial actions or had a test result after the initial exceedance that was below the lead action level.
- We reviewed all available documentation that the District had for reporting the laboratory results including the former Head of Buildings and Ground's email receipts that he received the lab results, HERDS reporting, and uploads to the District's website as well as interviewing DOH and Madison County Department of Public Health employees.

9 https://www.health.ny.gov/environmental/water/drinking/lead/docs/leadtestinginschoolsguidancedocument.pdf

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). 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.

Unless otherwise indicated in this report, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or size of the relevant population and the sample selected for examination.

## Contact

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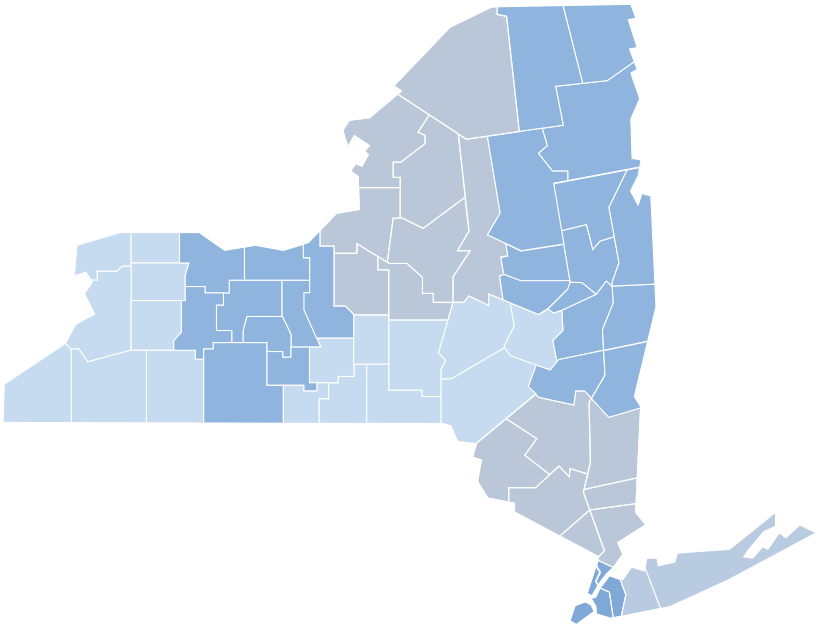

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