

New York State Comptroller
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Ravena-Coeymans- Selkirk Central School District

Audit Follow-Up Review

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Prepared by the Division of Local Government and School Accountability

Audit Follow-Up Review

Ravena-Coeymans-Selkirk Central School District

Purpose of the Audit Follow-Up Review

In July 2025, the Office of the New York State Comptroller (OSC) issued an audit report titled *Ravena-Coeymans-Selkirk Central School District: Lead Testing and Reporting (S9-25-7)*¹ which reported that District officials did not properly identify, report or implement necessary remediation to reduce lead exposure at all potable water outlets as required by the New York State (NYS) Public Health Law and Department of Health (DOH) regulations.² The audit identified water outlets that were not sampled or properly secured against use, water outlets that exceeded the lead action level without effective controls and deficiencies in reporting test results.

The audit report included seven recommendations to improve the District's sampling, testing, remediation, reporting and oversight of its lead testing program. The Superintendent of Schools indicated in the District's response that District officials had initiated corrective action.³

Because effective corrective action will improve the District's compliance with applicable safety and health regulations, we conducted a follow-up review from July 23, 2026 through July 28, 2026, to determine whether the District's corrective action plan (CAP) moved beyond intent to effective, sustained practice.

The follow-up review was limited to inspecting certain documents related to the issues identified in the audit report and the District's CAP, interviewing the Director of Information Technology and Building and Grounds (Director) and observing a sample of water outlets. The scope of the review does not constitute an audit under generally accepted government auditing standards (GAGAS).

Review Summary

District officials fully implemented three recommendations and partially implemented four recommendations. The three fully implemented recommendations addressed reporting and recordkeeping. The four partially implemented recommendations addressed sampling, testing, remediation and review of the District's lead testing program.

Specifically, we identified four water outlets that could be used for drinking or cooking were not included in the District's sampling or remediation plans. In addition, 44 unsampled water outlets were not properly secured against use and one water outlet that exceeded the lead action level did not have documented effective controls to prevent consumption.

Until the remaining recommendations are fully implemented, District officials cannot ensure that all applicable water outlets are identified and tested or appropriately secured against use. As a result, students and staff could consume water from outlets that were not tested and could potentially exceed the lead action level. The District's self-reported water sampling and lead testing results for the 2023 to 2025 compliance period are available through DOH's searchable database.⁴

For the three fully implemented recommendations, District officials documented roles and responsibilities for the lead testing program, maintained records of notification efforts and notified all required parties within the required time periods for the testing reviewed.

1 The full report is available at: <https://www.osc.ny.gov/files/local-government/audits/2025/pdf/ravena-coeymans-selkirk-central-school-district-s9-25-7.pdf>.

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

3 The District officials' response is available at: <https://www.osc.ny.gov/files/local-government/audits/2025/pdf/ravena-coeymans-selkirk-central-school-district-s9-25-7.pdf#page=14>.

4 https://health.data.ny.gov/Health/Lead-Testing-in-School-Drinking-Water-Sampling-and/rygk-rhum/data_preview.

During the review, we discussed the basis for the recommendations and the operational considerations relating to these issues with District officials. We encourage District officials to fully implement the remaining audit recommendations.

Recommendations and Implementation Status

Because District officials have not implemented all recommendations, the remedial action plan remains incomplete, and effective controls were not provided or documented for all exempted water outlets or those exceeding the lead action level.

Sampling, Testing and Remediation Procedures

1. Develop sampling and remediation plans for all District water outlets that could be used for drinking and cooking, including details on which water outlets will be considered exempt from sampling and their controls to secure against use – **Partially Implemented**
2. Sample all water outlets that could be used for drinking and cooking and properly secure any water outlets designated as exempt from sampling – **Partially Implemented**
3. Remediate or implement effective long-term controls for all water outlets that exceed the lead action level – **Partially Implemented**
4. Review all work related to the lead testing program for accuracy and completeness – **Partially Implemented**

Sampling and Remedial Action Plans – District officials developed sampling and remediation plans for water outlets that could be used for drinking and cooking, using DOH's templates. They included details on which water outlets were considered exempt from sampling and the controls to prevent their use. We observed a sample of 174 water outlets. We identified four water outlets (2 percent) that were not listed on the sampling or remediation plans: two dishwashing sink sprayers, one handwashing sink and one classroom sink sprayer. The Director told us he did not include these water outlets in the remediation plan in error.

Unsecured Exempt and Untested Outlets – For the same sample of 174 water outlets, we determined 44 water outlets⁵ were not tested and were not properly secured against use. One sink sprayer was overlooked, and the other 43 water outlets (primarily in bathrooms) had signs posted explaining the water outlets should be used for "handwashing only, not for drinking use," but no additional controls were documented, as required by DOH regulations. The Director told us each school building with students included educational controls through morning announcements advising students and staff to drink only from the water fountain and bottle filler outlets and not to drink from any water outlets with signs. However, because the announcements were not documented in the remediation plan or elsewhere, there was no evidence that these educational controls were implemented. The Director provided auditors with planned educational controls for the 2026-27 school year, including documenting educational controls, staff training, daily announcements and written contracts for laboratory students.⁶

Remediation – District officials tested water outlets on six different dates throughout May, October and December 2025, testing a total of 217 water outlets, with five exceeding the lead action level. One water outlet was remediated and retested below the lead action level, and three water outlets had effective controls in place to prevent consumption. However, one water outlet, an elementary school kitchen handwashing sink, had signs as the only documented control. As explained in the preceding paragraph, the Director told us there should have been educational controls as well but did not provide supporting documentation to verify these controls.

Review of Work for Accuracy and Completeness – District officials developed checklists for lead testing, including procedures to review the program and ensure all water outlets were tested as planned. However, the Director did not provide a reasonable explanation why four of the 174 water outlets we reviewed were not included in the sampling plan or why educational controls were not documented.

⁵ Includes the four water outlets that were not included in the sampling or remediation plans.

⁶ Staff collected signed student contracts regarding laboratory safety which included a specific paragraph addressing water consumption restrictions.

Until all applicable water outlets are included in the sampling and remediation plans and unsampled or exempted water outlets have the required controls to prevent consumption, students and staff could use water outlets that have not been tested or secured and that could potentially exceed the lead action level.

Reporting the Test Results

5. Develop procedures for all individuals involved in lead testing and reporting and their roles and responsibilities – **Fully Implemented**
6. Notify all required parties in the required time periods after lead testing results are received – **Fully Implemented**
7. Keep records of all notification efforts performed – **Fully Implemented**

Roles and Responsibilities – District officials developed a “Lead Water Testing - Assigned Roles and Responsibilities” document that outlined the responsibilities of all individuals involved in the lead testing program, including sampling plan development, sample collection, lab contact, results coordination, remediation and reporting.

Notification and Record Keeping – District officials tested water outlets on six different dates throughout May, October and December 2025. District officials maintained records of all notification efforts and notified all required parties within the required time periods after receiving lead testing results.

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