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August 14, 2025

Office of the State Comptroller
Division of Local Government & School Accountability
RDU – CAP Submission
110 State Street, 12th Floor
Albany, NY 12236

Unit Name: Greater Johnstown School District
Report Name: Lead Testing and Reporting
Audit Report Number: S9-25-15 1 August 2025

RE: Correction Action Plan

For each recommendation included in the audit report, the following is our corrective action(s) taken or proposed. For recommendations where corrective action has not been taken or proposed, we have included the following explanations.

- I. Finding 1: District officials did not ensure all required potable water outlets were sampled and tested for lead contamination for Cycle Two.
 - A. Audit Recommendation 1: Develop a comprehensive/complete sampling plan and a remedial action plan 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 the controls to secure against use.
 1. Implementation Plan of Action: The District has implemented a comprehensive sampling plan and remedial action plan for all district water outlets using the New York State Department of Health template. The plan also includes a photo and numerical identification of all district water outlets.
 2. Implementation Date: The comprehensive sampling plan and remedial action plan was implemented as of March 1, 2025.
 3. Person Responsible for Implementation: The comprehensive sampling plan and remedial action plan is the responsibility of the Director of Facilities.

- B. Audit Recommendation 2: Sample all water outlets that could be used for drinking and cooking and properly secure any water outlets designated as exempt from sampling.
1. Implementation Plan of Action: The District had testing scheduled prior to the audit commencing in February 2025, and has continued since that time to conduct testing of all waters as required.
 2. Implementation Date: Testing of all water outlets was implemented as of February 1, 2025.
 3. Person Responsible for Implementation: The Director of Facilities is responsible for lead testing and reporting.
- C. Audit Recommendation 3: Remediate or implement effective long-term controls for all water outlets that exceed the lead action level.
1. Implementation Plan of Action: The District will continue to use proper signage to secure against water outlets from being used for cooking and/or drinking, and further strengthen controls by educating students and staff to reinforce that water outlets with this signage are not to be used for cooking and/or drinking, or by removing certain outlets from operation.
 2. Implementation Date: The District has either properly signed or removed water outlets from operation as of March 1, 2025. The District will educate students and staff on said signage and reinforce water outlets that are not to be used for cooking and/or drinking when school resumes on September 4, 2025.
 3. Person Responsible for Implementation: The Director of Facilities is responsible for properly securing water outlets from use through signage and/or removing water outlets from operation. Building principals are responsible for educating their students and staff.
- D. Audit Recommendation 4: Review all work related to the lead testing program for accuracy and completeness.
1. Implementation Plan of Action: The District will continue to keep abreast of the lead in school drinking water requirements, and periodically review that our program remains in compliance.
 2. Implementation Date: The District implemented this recommendation as of March 1, 2025 and will continue to monitor for compliance.
 3. Person Responsible for Implementation: The Director of Facilities maintains this responsibility.
- II. Finding 2: District officials did not report the results of the lead testing properly or in the required time periods.

- A. Audit Recommendation 5: Develop procedures identifying all individuals involved in lead testing and reporting and their roles and responsibilities.
1. Implementation Plan of Action: The District has developed procedures involved with lead testing and reporting and the appropriate roles and responsibilities.

2. Implementation Date: The District implemented this recommendation as of March 1, 2025 and will continue to strengthen our procedures to ensure compliance with lead in the school drinking water requirements.
 3. Person Responsible for Implementation: The Director of Facilities and the Superintendent are responsible for ensuring implementation of this recommendation.
- B. Audit Recommendation 6: Notify all required parties in the required time periods after lead testing results are received.
1. Implementation Plan of Action: The District is notifying our school community within 10 days of receiving testing results through our communication platform, ParentSquare, and posting full testing results on our website.
 2. Implementation Date: The District began notifying our school community through ParentSquare and posting full test results on our website immediately upon receipt of the test results for our school buildings as of March 1 2025.
 3. Person Responsible for Implementation: The Director of Facilities and Superintendent are responsible for the implementation of this recommendation.
- C. Audit Recommendation 7: Keep accurate records of all notification efforts performed.
1. Implementation Plan of Action: The District's communication platform, ParentSquare, maintains a record of all posts to our school community, and has the ability for us to pull distribution lists.
 2. Implementation Date: The District implemented this recommendation as of March 1, 2025.
 3. Person Responsible for Implementation: The Director of Facilities and Superintendent are responsible for ensuring compliance with this recommendation.

Sincerely,
Alicia D. Koster
Alicia D. Koster
Superintendent of Schools

Cf: Board of Education
Director of Facilities