

**Virginia Department of Health  
Sewage Handling and Disposal Advisory Committee (SHADAC) Meeting  
September 25, 2018**

**Meeting Location:**

James Madison Building  
5<sup>th</sup> Floor Main Conference Room  
109 Governor Street  
Richmond, Virginia 23219

**List of Attendees:**

SHADAC Members

Curtis Moore – Virginia Onsite Wastewater Association  
Alan Brewer – Virginia Association of Counties  
V'Lent Lassiter – Chesapeake Bay Local Assistance Department  
Tammy Faulkner – Virginia Environmental Health Association  
Lance Gregory – Virginia Department of Health (VDH)

VDH Staff and Members of the Public

Anthony Creech

Paul Sanders

Section 12VAC5-610-50 of the Sewage Handling and Disposal Regulations states that the SHADAC shall establish its rules of order. On November 7, 2008, the SHADAC adopted rules which require at least eight voting members of the committee to be present for a quorum. Less than eight voting members of the SHADAC were present. Therefore, the meeting could not officially be called to order to conduct the business of the SHADAC.

Mr. Gregory walked through the draft means testing and hardship guideline for the transition of onsite sewage system and private well evaluation and design services as required by House Bill 888 of the 2018 General Assembly Session. While walking through the hardship guidelines, Mr. Gregory asked for feedback from those present at the meeting; however, the committee members could not make motions or provide specific recommendation on behalf of the SHADAC. Feedback on the draft hardship guidelines included:

- Although the guidelines are proposed to be revised annually, the initial draft should include information regarding aspects of the guidelines that do not become effective until after June 30, 2020.
- Suggest moving ongoing income eligibility hardships under the means testing section.
- Suggest moving language from the Fee Regulations into a footnote.
- Regarding the proposed equation for determining whether there area sufficient number of private sector service providers:
  - Using the equation at a distract rather than locality level.

- Include certification letters and subdivision evaluations to equation.
  - Add another exclusion that if a locality/district has more than some percent of designs from private sector, then the locality automatically transitions.
- Regarding disciplinary action that results in revocation, add or suspension.
- Regarding availability of service providers:
  - Need to take into account someone seeking multiple applications from an OSE or PE at one time.
  - Change time lines to 30 days rather than 15 days.
- Case-by-case hardships must be unique situations; equate to variance request.
- Cost needs to be verified; need the name of the designer.

DRAFT

**Virginia Department of Health  
Sewage Handling and Disposal Advisory Committee (SHADAC) Meeting  
Agenda**

Date: September 25, 2018  
Time: 10 am to 2 pm  
Location: James Madison Building  
5<sup>th</sup> Floor Main Conference Room  
109 Governor Street  
Richmond, Virginia 23219

**Administrative (20 minutes)**

1. Welcome (5 minutes)
2. Approve agenda. (5 minutes)
3. Review summary from May 11, 2018 meeting. (5 minutes)
4. SHADAC Representatives – Request to Organizations (5 minutes)

**Public Comment Period (15 minutes)**

**Standing Agenda Items (20 minutes)**

1. Issues related to internal VDH policies and processes. (20 minutes)
  - a. Local ordinances. (10 minutes)
  - b. GMP 2017-02; NOAVs (10 minutes)

**Break (10 minutes)**

**Old Business (55 minutes)**

1. SB 1577 Report (5 minutes)
2. House Bill 887 Implementation (10 minutes)
  - a. GMP 2018-02 update
3. House Bill 888 Implementation (10 minutes)
  - a. GMP 2018-03 update
4. Hardship Guidelines and Petition for Services (30 minutes)

**Break (10 minutes)**

**Old Business Continued (60 minutes)**

4. Hardship Guidelines and Petition for Services (60 minutes)

**Break (10 minutes)**

**New Business (55 minutes)**

1. Civil Penalties and Alternative Onsite Sewage System Enforcement (30 minutes)
  - a. GMP 2018-01 (10 minutes)
  - b. Letters to Alternative Onsite Sewage System Owners (20 minutes)
2. Electronic submission of evaluations and designs (10 minutes)

July 1, 2019

**MEMORANDUM**

**TO:** District Health Directors  
Environmental Health Managers  
Office of Environmental Health Services Staff  
Onsite Soil Evaluators  
Professional Engineers  
Onsite System Operators and Installers  
Water Well System Providers

GMP #2019-01

**THROUGH:** M. Norman Oliver, MD, MA  
State Health Commissioner

**THROUGH:** Allen Knapp, Director  
Office of Environmental Health Services

**FROM:** Lance Gregory, Director  
Division of Onsite Sewage and Water Services, Environmental Engineering,  
and Marina Programs

**SUBJECT:** GUIDANCE MEMORANDA AND POLICY (GMP) 2019-01  
House Bill 888; Hardship Guidelines

**PURPOSE:** This policy outlines the procedure for means testing of applicants who petition the Virginia Department of Health (VDH) for evaluation and design services for onsite sewage systems and private well pursuant to Chapter 831 of the 2018 Virginia Acts of Assembly. This policy also establishes Hardship Guidelines whereby the Virginia Department of Health (VDH) may serve as a provider of last resort for evaluation and design services for onsite sewage systems and private wells pursuant to Chapter 831 of the 2018 Virginia Acts of Assembly.

**SCOPE:**

This policy outlines the procedure for means testing of applicants who petition the Virginia Department of Health (VDH) for evaluation and design services for onsite sewage

systems and private well pursuant to Chapter 831 of the 2018 Virginia Acts of Assembly ([HB 888](#)). This policy also establishes Hardship Guidelines necessary to implement the transition of evaluation and design services for onsite sewage systems and private wells to the private sector, while maintaining VDH as a provider of last resort as outlined in HB 888. Property owners that do not meet these Hardship Guidelines or the income eligibility criteria established in HB 888 are required to obtain evaluation and design services from the private sector.

#### **AUTHORITY:**

HB 888, as amended and effective as of July 1, 2018, provides authority for VDH to gradually transition evaluation and design services for onsite sewage systems and private wells to the private sector. HB 888 provides authority for VDH to continue providing evaluation and design services associated with a building permit for a principal place of residence or the repair of a system that is for a principal place of residence from July 1, 2019 to June 30, 2020 for applicants with household income at or below 400 percent of the federal poverty guidelines established by the U.S. Department of Health and Human Services. HB 888 also provides authority for VDH to establish guidelines to maintain VDH as a provider of last resort for property owners who demonstrate a specific hardship in obtaining private sector evaluation and design services associated with a building permit for a principal place of residence or the repair of a system that is for a principal place of residence.

#### **BACKGROUND:**

VDH staff have historically served as the primary provider of site and soil evaluations and designs in the Commonwealth for onsite sewage systems and private wells. However, several pieces of legislation approved in the 1990's created a process for VDH to accept evaluations and designs from private sector service providers. Since that time, two overarching principles have emerged: VDH should continue providing regulatory oversight and VDH should increase private sector participation to the extent possible. Over time, and without a specific statutory mandate to require private evaluations and designs, the use of private sector service providers gained broad acceptance in many parts of the Commonwealth.

In 2016, VDH released A Plan for the Orderly Reduction and Elimination of Evaluation and Design Services by the Virginia Department of Health for Onsite Sewage Systems and Private Wells ([HB 558 Report](#)). The HB 558 Report laid out VDH's strategic vision to shift evaluation and design services for onsite sewage systems and private wells to the private sector in an orderly manner so limited VDH resources can be focused on improving public health and groundwater supplies. The HB 558 Report presented 20 specific recommendations to implement the strategic vision, including a recommendations for VDH provide means testing of applicants over an initial transition period and to establish guidelines to serve as a provider of last resort for property owners that demonstrated specific hardships in obtaining private sector services. VDH recognized there are several geographic areas within the Commonwealth, as well as several application types, that will be particularly difficult to transition to the private sector. VDH recommended means testing and the development of guidelines to address situations in which owners could demonstrate a hardship in obtaining private sector services to allow VDH to

remain as a service provider, ensuring access to onsite sewage system and private well evaluation and design services for all Virginians.

Chapter 602 of the 2017 Virginia Acts of Assembly (HB 2477) directed VDH to take steps to begin eliminating site evaluation and design services for onsite sewage systems and private wells provided by VDH. This was accomplished by enacting recommendations from the HB 558 Report that could be done through agency policy. In 2018, the Virginia General Assembly passed HB 888 directing VDH to enact the remaining recommendation from the HB 558 Report to complete a transition of evaluation and design services to the private sector. HB 888 lays out a plan to transition onsite sewage system and private well evaluation and design services to the private sector over five years. However, HB 888 maintains the ability for VDH to provide evaluation and design services throughout the transition based on means testing of applicants. HB 888 also maintains the ability for VDH to provide evaluation and design services throughout and after the five-year transition period for property owners that demonstrate a specific hardship in obtaining private sector evaluation and design services associated with a building permit for a principal place of residence or the repair of a failing system that is for a principal place of residence.

HB 888 sets out specific income eligibility criteria for means testing of applicants from July 1, 2019 to June 30, 2023, using the federal poverty guidelines. HB 888 also directs VDH to develop guidelines for hardships, and requires that the guidelines include considerations for hardships based on (i) the availability of properly licensed service providers working within a locality or region, (ii) the disciplinary history of private sector providers, and (iii) the cost of private sector services. The hardship guidelines established by this policy set the criteria for property owners to request onsite sewage system and private well evaluation and design services from VDH as directed by HB 888.

#### **EXCLUSIONS FROM MEANS TESTING AND HARDSHIP GUIDELINES**

Pursuant to HB 888 all owners must seek private sector services for the following beginning July 1, 2018: onsite sewage system voluntary upgrades, certification letters, subdivision evaluations, and applications for new onsite sewage systems that are not for a principal place of residence. The means testing criteria and hardship guidelines outlined in this policy do not apply to these application types.

In addition, this policy does not apply to evaluations and designs that required private sector design services prior to July 1, 2018, by VDH policy. These services are any evaluation or design for: non-residential onsite sewage systems; onsite sewage systems that will use over 1,000 gallons per day; alternative onsite sewage systems; alternative discharging sewage systems; and onsite sewage system designs that require a professional engineer.

#### **MEANS TESTING:**

From July 1, 2019, to June 30, 2020, property owners may receive the following service from VDH provided their household income is at or below 400 percent of the federal poverty guidelines established by the U.S. Department of Health and Human Services (federal poverty

guidelines); evaluation and design services for new conventional onsite sewage systems serving a principal place of residence; evaluation and design services for private wells serving a principal place of residence; evaluation and design services to repair conventional onsite sewage systems serving a principal place of residence; and safe, adequate, and proper evaluation services for conventional onsite sewage systems serving a principal place of residence (as required by §32.1-165). Property owners seeking such services must petition VDH to provide services using the Petition for VDH Services Form (Appendix A). Means testing of the property owner's income shall follow the same procedure as the determination of income eligibility for fee waivers (see GMP 2016-02).

From July 1, 2020, to June 30, 2021, eligibility shall be reduced to property owners with household income at or below 300 percent of the federal poverty guidelines. From July 1, 2021, to June 30, 2022, eligibility shall be reduced to property owners with household income at or below 200 percent of the federal poverty guidelines. From July 1, 2022, to June 30, 2023, eligibility shall be reduced to property owners with household income at or below 100 percent of the federal poverty guidelines. On and after July 1, 2023, only owners meeting the hardship guidelines outlined in this policy are eligible for evaluation and design services from VDH. A breakdown of the means testing criteria by year and by family size is included in Appendix A.

**Commented [GL(1)]:** Do we need to mention future means testing criteria, or should the eligibility just be updated as part of the annual review outlined at the end of the policy.

#### **HARDSHIP GUIDELINES:**

Property owners that do not meet the means testing criteria outlined in HB 888, may still be eligible to receive services from VDH. Property owners meeting any of the following hardships shall be eligible to receive the following services from VDH: evaluation and design services for new conventional onsite sewage systems serving a principal place of residence; evaluation and design services for private wells serving a principal place of residence; evaluation and design services to repair conventional onsite sewage systems serving a principal place of residence; and safe, adequate, and proper evaluation services for conventional onsite sewage systems serving a principal place of residence (as required by §32.1-165). Property owners seeking services based on the following hardship guidelines must petition VDH to provide services using the Petition for VDH Services Form

##### **A. Income Eligibility**

Any property owner that is eligible to receive a fee waiver pursuant to section 12VAC5-620-80.A of the Regulations Governing Application Fees for Construction Permits for Onsite Sewage Disposal Systems and Private Wells (12VAC5-620, the Fee Regulations) shall be eligible to receive VDH evaluation and design services. Section 12VAC5-620-80.A establishes the fee waiver when an owner whose family income is at or below the 2013 Poverty Income Guidelines for the 48 Contiguous States and the District of Columbia established by the [Department of Health and Human Services, 78FR 5182](#) (January 24, 2013), or any successor guidelines, shall not be charged a fee. Determination of eligibility for a hardship based on income shall follow the same procedure as the determination of income eligibility for fee waivers (see [GMP 2016-02](#)).

**Commented [GL(2)]:** Is it even necessary to discuss ongoing hardships based on income, since these owners would qualify for services under the means testing portion of HB 888 for several years.

**Commented [GL(3)]:** Would apply to new construction for principal place of residence. Will also apply to SAP for principal place of residence once the new fee begins July 1, 2019.

Further, any property owner with income below 200 percent of the federal poverty guidelines as established by the United States Department of Health and Human Services shall be eligible to receive VDH evaluation and design services when the application is for a pit privy or for a repair of a failing onsite sewage system.

**Commented [GL(4):** The 2018 Budget Bill establishes a waiver for OSS repair fees for persons with income below 200% of the FPG. VDH will be submitting an exempt regulatory action to amend the Fee Regulations to incorporate this fee waiver.

#### B. Replacement Wells and Well Abandonments

Any property owner that is eligible to receive a fee waiver pursuant to section 12VAC5-620-80.D or 12VAC5-620-80.E of the Fee Regulations shall be eligible to receive VDH evaluation and design services. Section 12VAC5-620-80.D allows the fee to be waived for any person applying for a construction permit for the replacement of a private well. Section 12VAC5-620-80.E allows the fee to be waived for any person applying for a permit to properly and permanently abandon or decommission an existing well on property that is their principal place of residence.

#### C. Number of Private Sector Providers

Any property owner seeking evaluation and designer services in a locality with an insufficient number of private sector service providers shall be eligible to receive VDH evaluation and design services. A locality will be deemed to have an insufficient number of private sector service providers when the number of bare applications received in the locality over the previous fiscal year exceeds the estimated number of additional designs that the private sector could provide in that locality. VDH will estimate the number of additional designs that the private sector could provide in a locality by using the following equation:

$$(P \times A)1.25 - W = X$$

P = Number of private sector providers that submitted at least five evaluations and designs within the locality over the previous fiscal year.

A = Average number of evaluations and designs per private sector provider submitted within the region over the previous fiscal year. (A map showing the specific regions is provided below; Map 1.)

1.25 = Private sector growth factor.

W = Total number of private sector evaluations and designs submitted within the locality over the previous fiscal year.

X = Estimated number of additional evaluations and designs that could be provided by the private sector.

Any locality with fewer than two private sector service providers submitting at least five evaluations and designs each in the previous fiscal year will be determined to have an insufficient number of private sector service providers. Based on this requirement, the hardship guidelines outlined in this policy do not apply to any property owner seeking evaluation and design services in a locality where the local health department received 10 or fewer total applications for onsite sewage system and private well evaluations and designs between July 1, 2018, and June 30, 2019. This exclusion is provided because a locality receiving 10 or fewer



total applications will by default have fewer than two private sector service providers submitting at least five evaluations and designs.

VDH will use the agency's statewide environmental health database to determine P, A, and W. For determining the average number of private sector designs, VDH will use Map 1 to set each region for review, and will include only private sector providers submitting at least 10 evaluations and designs within the region over the previous fiscal year. The equation will be run separately for onsite sewage system evaluations and designs, private well evaluations and designs, and safe, adequate, and proper evaluations and designs. Therefore, it may be determined that a locality has an insufficient number of private sector service providers for one service, but an adequate number of private sector service providers for another.

**Commented [GL(5):** Should the equation be run separately for onsite, wells, and SAP? You could have a district where running the numbers combined, you just barely get over the line of qualifying or not qualifying for a hardship. But if you run them separately for septic construction permits, well permits, and SAPs, owners may qualify for some services but not all. If combined, you could have localities meeting the hardship criteria simply because they do a high volume of bare application well only designs, even if all most all of the sewage systems are designed by the private sector.

**Map 1: Service Provider Regions**



**Example: Locality A**

Local health department received 204 bare applications between July 1, 2018, and June 30, 2019.

P = 4 private sector providers submitted at least 5 design within Locality A between July 1, 2018, and June 30, 2019.

A = Private sector providers submitted an average of 37 evaluations and designs within the region between July 1, 2018, and June 30, 2019.

W = Private sector submitted a total of 126 evaluations and designs within Locality A between July 1, 2018, and June 30, 2019.

$(4 \times 37)1.25 - 126 = 59$  (Estimated number of additional evaluations and designs that could be provided by the private sector in Locality A).

The number of estimated additional designs the private sector can provide in Locality A is lower than the number of bare applications received. Therefore, VDH determines Locality A to have an insufficient number of private sector services providers; property owners qualify for a hardship.

VDH will post a list of localities with an insufficient number of private sector services providers on the agency website. The list will be updated annually using information from the agencies statewide environmental health database for the previous fiscal year and posted no later than July 15<sup>th</sup>.

Private sector service providers that receive a disciplinary action against their license from the Department of Professional and Occupational Regulations (DPOR) will not be counted towards the number of private sector providers submitting evaluations and designs within a locality for one year following the disciplinary action. If the disciplinary action results in revocation of licensure, the service provider will not be counted towards the number of private sector providers submitting evaluations and designs within a locality for one year following re-issuance of their license by DPOR.

#### D. Availability of Private Sector Service Providers

Owners shall qualify for a hardship to receive evaluation and design services for new onsite sewage systems serving a principal place of residence when a private sector provider is not available within 15 business days of the date of application. Owners shall qualify for a hardship to receive evaluation and design services for new private wells when a private sector service provider is not available within 15 business days of the date of application. Owners shall qualify for a hardship to receive evaluation and design services to repair onsite sewage systems when a private sector provider is not available within five business days of the date of application. Owners shall qualify for a hardship to receive safe, adequate, and proper evaluation services (as required by §32.1-165) when a private sector provider is not available within 15 business days of the date of application.

**Commented [GL(6):** Other possible options: i) 15 days following with new construction; ii) use VDH's average processing time for bare applications statewide; iii) use average processing time for bare applications by locality.

Property owners must contact at least two private sector providers prior to petitioning VDH for services. The owner must provide the names of the private sector providers contacted on the Petition for VDH Services Form

#### E. Further Considerations

Owners that do not qualify for VDH specific hardships outlined in this policy may petition the District Health Director for further consideration provided the requested evaluation and design service is not exempt from the hardship guidelines. The District Health Director may delegate review of such request to the District Environmental Health Manager. Such requests will be reviewed on a case-by-case basis, and the final determinations will be tracked by each local health district.

Request for hardships based on the cost of private sector evaluation and design services is included as a further consideration, and will be reviewed on a case-by-case basis. Property owners must contact at least two private sector providers prior to petitioning VDH for services when the hardship is listed as the cost of services. The property owner must provide the names of the private sector providers contacted, and the estimated cost of services provided by each.

To assist in the review of hardship request based on the cost of private sector evaluation and design services, VDH will provide property owners receiving private sector evaluation and design services an opportunity to anonymously report the cost of services. Information regarding the average cost of private sector services provided by property owners will be posted on the agency website with breakdowns at the state, regional, and locality level.

#### F. Annual Review

VDH will conduct a review of this policy annually until at least July 1, 2023. The review shall include the following:

1. Recommendations for revisions provided by the Sewage Handling and Disposal Advisory Committee and other stakeholders.
2. Analysis of requests for VDH services pursuant to income eligibility criteria in Part 1, §4 of HB 888 to determine whether the income eligibility criteria in this policy should be revised.
3. Analysis of the estimated number of additional evaluations and designs that could be provided by the private sector within localities versus the actual increases observed over the previous fiscal year to determine whether modification to the equation in Section IV is necessary.
4. Analysis of request for consideration of hardships not specified within these Hardship Guidelines and determinations rendered for each case by District Health Directors to determine whether additional specific hardships or exclusion are necessary.
5. Analysis of the percent private sector evaluations and designs for alternative onsite sewage system and conventional onsite sewage systems to determine whether additional verification of property owner disclosure is required.<sup>1</sup>

A copy of VDH's annual review shall be posted on the agency website.

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<sup>1</sup> Private sector service providers are required to disclose to the property owner when a conventional onsite sewage system is an option.

Appendix A  
Petition for VDH Services Form

I, (insert name), am petitioning VDH to provide evaluation and design services based on the following:

- Means test (household income at or below 400% of the federal poverty guidelines)
- VDH Hardship Guidelines

If you selected VDH Hardship Guidelines, please check all of the following guidelines that apply:

- Qualify for fee waiver pursuant to 12VAC5-620-80.A
- Replacement Well
- Well Abandonment
- Onsite Sewage System Repair – Income below 200% of the federal poverty guidelines
- Pit Privy – Income below 200% of the federal poverty guidelines
- Insufficient Number of Private Sector Service Providers
- Fewer Than 2 Private Sector Services Providers Submitting at Least 5 Evaluations and Designs Each in the Previous Fiscal Year
- Private Sector Not Available within 15 Days – New Onsite Sewage System, New Private Well, or Safe, Adequate, and Proper Evaluation  
Provide the names of private sector services providers you contacted: \_\_\_\_\_  
\_\_\_\_\_
- Private Sector Not Available within 5 Day – Repair Onsite Sewage System  
Provide the names of private sector services providers you contacted: \_\_\_\_\_  
\_\_\_\_\_
- Other

**Commented [GL(7)]:** This information will be available on the VDH website.

**Commented [GL(8)]:** This information will be available on the VDH website.

If other, please provide a detailed description of your hardship in obtaining private sector evaluation and design services along with any relevant documents that you believe support your request. If your request is based on the cost of private sector evaluation and design services, please provide the name of at least two private sector service provider you contacted, and the estimated cost of services provided by each. (Detailed description can be attached)

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\_\_\_\_\_  
Owners Signature

\_\_\_\_\_  
Date

Petition for services  Approved  Denied by \_\_\_\_\_

Appendix B  
U.S. Department of Health and Human Services  
Federal Poverty Guidelines (FPG)

Commented [GL(9)]: 2018 numbers. Will update annually as part of the review process.

Family Size	100% FPG	200% FPG	300% FPG	400% FPG
1	\$12,140	\$24,280	\$36,420	\$48,560
2	\$16,460	\$32,920	\$49,380	\$65,840
3	\$20,780	\$41,560	\$62,340	\$83,120
4	\$25,100	\$50,200	\$75,300	\$100,400
5	\$29,420	\$58,840	\$88,260	\$117,680
6	\$33,740	\$67,480	\$101,220	\$134,960
7	\$38,060	\$76,120	\$114,180	\$152,240
8	\$42,380	\$84,760	\$127,140	\$169,520

Source: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation;  
<https://aspe.hhs.gov/poverty-guidelines>

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Appendix C  
Hardship Guidelines Summary

<b>Excluded from Hardship Evaluation</b>	<b>Qualify for Hardship</b>
Onsite Sewage System Voluntary Upgrades	New Onsite Sewage System for a Principal Place of Residence– Owner Qualifies for Fee Waiver Under 12VAC5-620-80
Certification Letters	SAPs – Owner Qualifies for Fee Waiver Under 12VAC5-620-80
Subdivision Evaluations	All Replacement Wells
New Onsite Sewage Systems Not For a Principal Place of Residence	Well Abandonment for a Principal Place of Residence
Non-residential Onsite Sewage Systems	Conventional Onsite Sewage System Repairs – Owner income below 200% of Federal Poverty Guidelines
Onsite Sewage Systems Greater than 1,000 GPD	Pit Privy – Owner income below 200% of Federal Poverty Guidelines
Alternative Onsite Sewage Systems	VDH Determines Locality Has an Insufficient Number of Private Sector Service Providers.
Alternative Discharging Sewage Systems	Any Locality With Fewer Than 2 Private Sector Services Providers Submitting at Least 5 Evaluations and Designs Each in the Previous Fiscal Year
Systems Requiring a Professional Engineer	New Onsite Sewage System for Principal Place of Residence– Private Sector Not Available Within 15 Business Days
Localities Receiving 10 or Fewer Total Applications; 7/1/2018 to 6/30/19	New Private Well – Private Sector Not Available Within 15 Business Days
	Conventional Onsite Sewage System Repairs – Private Sector Not Available Within 5 Business Days
	SAP – Private Sector Not Available Within 15 Business Days