The following questions were asked during the online training entitled "Mandatory TRACS Certification 2017" which was delivered on August 30, 2017. A recorded version of this class will be available through January 2018. You may view the class by using the following web address:
https://attendee.gototraining.com/17b30/recording/818506527720318721

Question 1: If we terminate a former property manager in WASS and remove all roles, is that an issue if they remain in the industry?

Answer 1: The requirement is to remove the Property Assignments by going to *User Maintenance / Property Assignment Maintenance*. There is no need to remove the roles if they remain in the industry. If the User fails to access WASS for 90 days, the User will be automatically terminated.

Question 2: All my Users currently have access and I can't recertify them until it expires.

Answer 2: The TRACS recertification is a new process that must be completed by December 31, 2017.

- First, the Coordinator must access the *WASS User Maintenance* function using their own Coordinator M-ID.
- The Coordinator must choose the option to *Maintain User – Roles*
- The Coordinator must make sure there is a check in the box next to the TCC (TRACS Coordinator) and TCR (TRACS Recertification) role. If these options are not checked, the Coordinator must click the checkbox to turn the Recertification functionality on.

To complete the setup and certification process for a new User:

1. Complete the Security Awareness Training/Cyber Awareness Challenge (unless already done in the last 12 months)
2. Request User Name and Password
3. Coordinator retrieves User Name through WASS User Maintenance
4. Coordinator assigns appropriate actions and roles
5. Coordinator completes property and/or contract assignment
6. Coordinator establishes relationship by going to the *TRACS link > TRACS Recertification link > Add/View/Delete Assigned Staff* link
7. Coordinator confirms assignments *TRACS link > TRACS Recertification link > View/Flag Actions/Roles* link
8. Coordinator requests certification *TRACS link > TRACS Recertification link > Request Recertification* link
9. User logs in to WASS
10. User clicks on iMAX or TRACS link
11. User accepts TRACS Rules of Behavior (ROB)
12. User prints and signs TRACS Rules of Behavior (ROB)
13. User keeps TRACS ROB on file and produces it upon request by HUD or HUD's representatives

It is assumed that an existing TRACS/iMAX User has already completed the Security Awareness Training and has already accepted and printed the TRACS ROB. Recertification must be complete by December 31, 2017.

The complete recertification process for an existing TRACS/iMAX User is:

1. Complete the Security Awareness Training/Cyber Awareness Challenge (unless already done in the last 12 months)
2. *Coordinator establishes relationship by going to the TRACS link > TRACS Recertification link > Add/View/Delete Assigned Staff* link
3. Coordinator confirms assignments *TRACS link > TRACS Recertification link > View/Flag Actions/Roles* link
4. Coordinator requests certification *TRACS link > TRACS Recertification link > Request Recertification* link
5. User logs in to WASS
6. User clicks on iMAX or TRACS link and continues to work as usual

Question 3: If we terminate a former property manager in WASS and remove all roles, is that an issue if they 'remain in the industry' at some other job not through us?

Answer 3: This will remove all access even if the User needs access for another property (e.g. CPAs submit financial statements for multiple properties within multiple portfolios). However, another WASS Coordinator can

re-assign the roles. The requirement is to remove the property assignments through *User Maintenance/Property Assignment Maintenance*.

Question 4: What if there is only one person to be Coordinator/ User?

Answer 4: HUD recommends two or more WASS Coordinators

Question 5: Do we assign TCC and TCR roles to ourselves?

Answer 5: Coordinators must assign actions and roles through *WASS User Maintenance/Maintain User Actions* and *User Maintenance/Maintain User Roles*. This is usually done when the Coordinator completes initial setup.

If you have access to TRACS, you have already established your Actions. The new task is to go to WASS *User Maintenance/Maintain User Roles* and click the checkbox next to the TCC (TRACS Coordinator) and TCR (TRACS Coordinator/Recertification) roles to "turn them on". Do not assign these roles to a WASS User.

Question 6: What activities count as "logging into TRACS" to maintain active status? Simply transmitting tenant files through iMAX?

Answer 6: If the User selects the iMAX or TRACS link from the WASS systems menu, or transmits a file via iMAX at least every 90 days, their ID will not be locked.

Question 7: I'm the only Coordinator and User, however, my supervisor wants me to keep him certified and he never goes into TRACS?

Answer 7: Coordinators should provide access to data based on the User's need to use that data.

Question 8: How do you know if you have a TCC or TCR role? I'm a Coordinator but I do not see the TRACS recertification selection in TRACS.

Answer 8: Go to WASS *User Maintenance/Maintain User Roles* to see if there is a checkbox next to those two roles.

Question 9: Do I have to assign all my current Users to me again now for TRACS?

Answer 9: You have to establish the relationship between the existing users' User IDs and your Coordinator ID by going to the *TRACS link > TRACS Recertification link > Add/View/Delete Assigned Staff* link.

Then you have to confirm the existing assignments, *TRACS link > TRACS Recertification link > View/Flag Actions/Roles* link then you must request certification *TRACS link > TRACS Recertification link > Request Recertification* link. These tasks must be completed no later than December 31, 2017.

Question 10: Like EIV, will the User request the recertification action and then Coordinator approves?

Answer 10: No, the User does not request certification through TRACS.

Question 11: To clarify, the Coordinator needs to enter the system and assign staff to the Coordinator?

Answer 11: For existing Users, the first step in the new process is to establish a relationship between the User and the Coordinator by going to the *TRACS link > TRACS Recertification link > Add/View/Delete Assigned Staff* link.

Question 12: We have issues when Users are kept active and change management companies because we can only see Users that are tied to our TINs that we have a Business Relationship set up for. We set up Users with our Management TIN and I have had this experience with many larger management companies.

Answer 12: If the User no longer needs access to the property information, you should go to WASS *User Maintenance/Property Assignment Maintenance* and remove access.

Question 13: Essentially: EIV every six months, TRACS once a year?

Answer 13: Coordinators will certify TRACS Users once a year.

Question 14: If a User is recertified early, does the month they recertify change?

Answer 14: HUD will consider the need to align TRACS recertification dates based on industry input. Additional information will be provided in 2018.

Question 15: Are there any certification reports that we are required to keep in our files when each User is assigned these roles?

Answer 15: At this time, HUD Form 9834 does not ask questions about TRACS User Certification

Question 16: Is this going to remove the TRACS ROB form?

Answer 16: No, the TRACS User Certification is set up so that TRACS Coordinators confirm that Users with access to TRACS really need access to TRACS. The TRACS ROB confirms that each individual User understands the rules about disclosure of TRACS data.

Question 17: Is it OK to certify Users prior to 9/1/2017 or do we have to wait?

Answer 17: Users should not be certified until 9/1/2017.

Question 18: If a User is assigned, but doesn't show up at all in the list of Users in the *Last Login Report*, what does that mean?

Answer 18: The Coordinator should double check to make sure the TRACS User is associated with the TRACS Coordinator by going to the *TRACS link > TRACS Recertification link > Add/View/Delete Assigned Staff* link.

Question 19: Just to clarify, to Flag a User is to start the removal process?

Answer 19: When you are in the *TRACS link > TRACS Recertification link > View/Flag Actions/Roles* link screen, TRACS is providing you with a list of Roles and Relationships for the individual User based upon the assignments in WASS. If you "flag" a role/action or property assignment/contract assignment for removal, access will be removed after 12/31. Property Assignment Maintenance relationships should be removed by accessing *User Maintenance/Property Assignment Maintenance*.

Question 20: If I have a User who accepted the TRACS ROB back in July will I have to recertify them again now?

Answer 20: The TRACS ROB and the TRACS Recertification are two completely different tasks. All existing TRACS Users must be certified between September 1, 2017 and December 31, 2017.

Question 21: What if the *Flag Actions & Roles* show "None" for each item?

Answer 21: This means that the User does not have role or action assignments in WASS for properties with which the Coordinator has a Business Partner Relationship (BPR).

Question 22: If there are multiple Coordinators, can Users be re-assigned to a new Coordinator if they were previously assigned to another Coordinator?

Answer 22: TRACS Users can be assigned to multiple Coordinators. It recommended that each property have two Coordinators. However, when there are two Coordinators for one property, only one Coordinator needs to complete the TRACS recertification process for the TRACS Users assigned to the property.

Question 23: How will this impact property assignment to CPA Auditors submitting financials?

Answer 23: CPAs who submit audited financial statements are using the FASSUB database which is also part of WASS. TRACS certification does not affect FASSUB Users at all.

Question 24: Are there any recertification reports that we are required to keep in our files when each User is assigned these roles?

Answer 24: Currently, owner/agents are required to maintain the signed TRACS ROB and the Security Awareness Training/Cyber Awareness Challenge training certificate for each User with access to TRACS. The Security Awareness Training/Cyber Awareness Challenge must be completed at least once per year (*since EIV Users are also required to complete the Security Awareness Training/Cyber Awareness Challenge, TRACS Users are no longer required to prove that the Cyber Awareness Challenge was completed within 90 days of acceptance of the TRACS ROB*)

Question 25: If there are 2 Coordinators and the User is assigned to both, can one of the Coordinators recertify the User or does the User need to be recertified by both since they are assigned to both?

Answer 25: The question is a little complicated. If an organization has 10 properties and there are two Coordinators with Business Partner Relationships with all 10 properties, then the User would only have to be certified by one Coordinator. However, if there are two Coordinators and Coordinator 1 has a Business Partner Relationship with properties 1 through 5 and Coordinator 2 has a Business Partner Relationship with properties 6 through 10, Coordinator 1 can only certify TRACS Users who continue to need access for properties 1 through 5 and Coordinator 2 can only certify TRACS Users who continue to need access for properties 6 through 10.

Question 26: There are only two of us that need access to TRACS. I am the Coordinator and the other is just a User. Do you think it would be recommended to have the other User as a Coordinator as well or, just hope I don't get sick :)?

Answer 26: HUD always recommends that there is more than one Coordinator

Question 27: Do Coordinators also have to log into TRACS at least once in every 90 days?

Answer 27: WASS is set up with multiple security redundancies. In order to continue to have access to WASS, Users and Coordinators must access WASS at least once every 90 days and must change the WASS password at least once every 90 days. TRACS Coordinators must also access either TRACS or iMAX at least once every 90 days in order to continue to be able to use TRACS or iMAX. Even when a TRACS User is certified by the TRACS Coordinators, TRACS Users must access either TRACS or iMAX at least once every 90 days in order to be able to continue to use TRACS or iMAX.

Question 28: If I am a User with access to 2 properties, each has its own Coordinator; each Coordinator is responsible for recertifying me for the 1 property he/she has access to. If 1 of the Coordinators doesn't submit my recertification, are all of my TRACS / iMAX roles are turned off? Or just for that 1 property?

Answer 28: The iMAX role is global and does not require "Property Assignment". If a TRACS User accesses TRACS for two different properties and each property has a different Coordinator, then each Coordinator must establish the relationship and each Coordinator must request recertification at least annually.

*Please note: There are cases when a TRACS User needs TRACS access for multiple portfolios. This means that multiple Coordinators will be certifying the same TRACS User (e.g. Contract Administrators, service bureaus, TRACS consultants, etc.). In order to allow the TRACS development team to enhance the process of certifying Users with multiple coordinators, it is recommended that the process for certifying these particular users **begins on or after November 1, 2017**.*

For example:

- *ABC Service Bureau submits TRACS files for three management companies*
- *Alpha Management Company has twenty properties*
- *Bravo Management Company has ten properties*
- *Charlie Management Company has ten properties*
- *ABC Service Bureau has three employees that submit TRACS files and view TRACS queries for all properties*
- *The Coordinator for Alpha Management Company will need to complete the TRACS recertification process for the three ABC Service Bureau employees*
- *The Coordinator for Bravo Management Company will need to complete the TRACS recertification process for the three ABC Service Bureau employees*
- *The Coordinator for Charlie Management Company will need to complete the TRACS recertification process for the three ABC Service Bureau employees*

Currently, the TRACS recertification process imposes a weekly limit on the number of coordinators who can request certification for an individual User. An October release will remove the limit and will make recertification easier for TRACS Users with the need to have TRACS/iMAX access for multiple portfolios.

Question 29: So how does a Coordinator get recertified for TRACS?

Answer 29: At this time, TRACS Coordinators do not have to be recertified to continue to use TRACS; only TRACS Users

Question 30: To avoid a Coordinator lock out, do Coordinators have to log into TRACS or can we just log into WASS?

Answer 30: In order to avoid being "locked out" of TRACS or iMAX, the TRACS Coordinator must access either TRACS or iMAX at least once every 90 days.

Question 31: So, I need to pull up the list of my Users and then click a button to recertify them for TRACS every 90 days - and this is separate from the annual TRACS ROB form, right?

Answer 31: TRACS Users are not recertified every 90 days. Users are recertified once per year.

Question 32: What if I already recertified my Users. Should I do it again after September 1st?

Answer 32: Yes

Question 33: For different Users, the Coordinator will have different Annual dates to recertification correct?

Answer 33: For existing users, TRACS recertification can be done for all Users at the same time between 9/1/2017 and 12/31/2017.

Question 34: How long after adding a new employee do they need to be certified in TRACS?

Answer 34: After September 1, 2017, any new employee who needs access to TRACS must be certified immediately. This is much like EIV. Once the TRACS User is set up (as described above), then the TRACS User can access WASS and click on either the TRACS or iMAX link. The first time the TRACS User does this, he/she will be prompted to accept the TRACS ROB.

Question 35: I have a User set as a backup for me in TRACS but normally/monthly she accesses EIV. Will she now need to go into TRACS every 90 days to maintain access during the year?

Answer 35: Yes

Question 36: How do we find out when our ROB is due?

Answer 36: The TRACS ROB is displayed once a year for acceptance. If there are any questions regarding the date, contact tracs@hud.gov.

Question 37: The goal would be to align the new employee with the other employees.

Answer 37: HUD has received several requests to add the ability to align TRACS Users recertification in the same month. This is under consideration and additional information will be provided in 2018.

Question 38: Can we have all Users sign the ROB on one set date to make the process transparent?

Answer 38: The ROB is set based upon the individual User – this is separate from the requirement for the Coordinator to re-certify.

Question 39: Can the Coordinator see the ROB dates?

Answer 39: No, they cannot.

Question 40: If a person signed on to their site software to submit the voucher and enters their WASS ID will this keep them active?

Answer 40: TRACS cannot speak to how site software is coded. If the User's ID is used to transmit to the file to iMAX, then the User would not be locked. Owner/agents should check with their site software developer to verify how the interface with TRACS works.

Question 41: I see in TRACS that I now have a TRACS1. When I open it is says having trouble connecting to ROB. Is this because it won't be live until 9/1?

Answer 41: You should not see TRACS1. This is part of the TEST Server. If you see TRACS1, please contact the Help Desk for assistance at tracs@hud.gov or 1-800-767-7588.

Question 42: Can I assign a TCC or TCR role to a User without them being a Coordinator?

Answer 42: Currently, you can, but you should not do so. Users will not be able to complete Coordinator or Certification tasks

Question 43: Just to clarify, if a TRACS User is locked they still have access to the other systems, correct?

Answer 43: If a TRACS User or TRACS Coordinator does not access TRACS or iMAX at least once every 90 days, they will be locked out of TRACS. The Coordinator can unlock Users by accessing the *TRACS link > TRACS Recertification link > User Last Login Report and Unlock Users* link. If the Coordinator is locked, they should contact the Help Desk for assistance. This does not affect other WASS systems. However, if a User or Coordinator does not access WASS at least once every 90 days, they will be locked out of WASS and thus will not have access to any of the WASS systems/databases. The User or Coordinator will have to contact the TAC Help Desk to resume access (1-888-245-4860).

Question 44: We have had a HUD contract since the 80s. When I search Users, I can see what I think is the info for all past Coordinators and Users. As long as these past people are terminated, this is OK correct?

Answer 44: As long as the relationship between Roles and Properties is removed, this is fine. If the User does not access WASS every 90 days, the User will be automatically terminated and that User no longer has access to any WASS systems.

Question 45: I am the Coordinator and sole User, do I assign both the TCC role and TCR role to myself?

Answer 45: When the TCC role is "turned on" for a Coordinator, the system will allow you to unlock User IDs. Both role the TCC and TCR roles allow access to the staff/relationship assignment and recertification functionality. The Coordinator must go to *User Maintenance/Maintain User Roles* to turn these options on.

Question 46: Can the historical information in iMAX be longer?

Answer 46: The TRACS Development Team can take that in to consideration (12 months.)

Question 47: Anyone who leaves your company should be terminated so they can get a new WASS ID at new company?

Answer 47: That is not required. If an employee leaves the company, the relationship between the role and the property or properties should be deleted by accessing *User Maintenance/Property Assignment Maintenance*.

There is no need to terminate the User. If a Coordinator leaves, relationship between the role and the property or properties should be deleted and the Business Partner Relationship should be deleted.

Question 48: As a company Coordinator for over 200 properties, do I need to log into each property TRACS feature to remain active and avoid termination/locked out?

Answer 48: No, you only need to access TRACS or iMAX at least once every 90 days – this is done once for each User/Coordinator", not once per property.

Other – Subsequent questions after the training:

At this time, there will not be a requirement for properties to save copies/screen prints of the re-certification requests in their files for Management and Occupancy Reviews (MORs.) However, HUD plans to revisit this in the future.

Coordinators should not delegate the functionality included in the Recertification Guide. Furthermore, non-coordinator users will not have the BPR to see the appropriate roles and actions for WASS on the flag role/actions for removal screen. See related question 5 from the training above.

Currently, Coordinators do not have to re-certify themselves. However, they can establish the coordinator / staff relationship with another coordinator, if they would like. See related question 29 above.

HUD does/did not automatically assign the TCC and TCR roles. That is the responsibility of the coordinator to assign via WASS. See related question 5 from the training above.

For external coordinators/users, the process is complete from their standpoint once the request for re-certification is submitted for a given user. The final close-out will occur automatically in the future - right now, it occurs within a week via an update at HUD - but external coordinators / users do not need to be concerned about this step.

To reiterate, the window is currently from 9/1/2017-12/31/2017 for this year. Timing for subsequent years will be determined by HUD. As noted in red above, if a given user is associated with multiple coordinators/properties (the key is the multiple coordinators) - the recommendation is to re-certify after 11/1/2017, as some additional changes are being made in October to make the process easier for these coordinators/users.