CNA e-Tool
Frequently Asked Questions

U.S. Department of Housing and Urban Development (HUD)
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CNA e-Tool Frequently Ask Questions

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A. Program Requirements

General Requirements

1. **Question:** When will HUD require use of the CNA e-Tool?

   **Answer:** Use of the CNA e-Tool has been required with all FHA multifamily mortgage insurance applications since November 1, 2017. Since February 1, use of the CNA e-Tool has been required for all Rental Assistance Demonstration (RAD) conversions, 10-year update capital needs assessments for FHA-insured multifamily properties, and other asset management milestones, such as partial payment of claims.

2. **Question:** Will public housing require use of the CNA e-Tool?

   **Answer:** No.

   If the question is regarding the ongoing requirements of a public housing property converted to private ownership through the Rental Assistance Demonstration (RAD), the answer depends on whether the property converted to a PBV (project-based voucher) or PBRA (project based rental assistance) HAP (housing assistance payments) contract.

   - PBV contracts, at this point, will not require use of the CNA e-Tool.
   - PBRA contracts will likely require use of the CNA e-Tool at the next required review period, which is typically at the 10-year anniversary of the HAP contract.

   HUD recommends you contact the specific HUD program office for the requirements for your portfolio.

3. **Question:** Will the HUD firm application submission package require a third party PCNA report when the CNA e-Tool is required?

   **Answer:** No. A third party prepared CNA in the CNA e-Tool replaces the paper reports formerly submitted as part of the paper application packages.

4. **Question:** How long is a CNA valid? What is the time frame during which it is acceptable to submit with a rent increase package?

   **Answer:** The lender must retain a qualified needs assessor who must complete the assessment not earlier than 180 days prior to the application for Firm Commitment. In the event that the lender fails to submit an acceptable application for Firm Commitment within 180 days from the date of the CNA, HUD will return the CNA to the lender and the lender must order an updated CNA. Please see the MAP Guide Chapter 5.10 for more information.
HUD Sec 202/811, 202/PRAC Projects

1. **Question:** What are the requirements for existing CNA e-Tool 10-year updates for HUD Sec 202/811, 202/PRAC projects, for example?


Rental Assistance Demonstration (RAD)

1. **Question:** When do RAD transactions require use of the CNA e-Tool?

   **Answer:** Per section 1.4.A of the RAD Notice, the CNA e-Tool is required for all properties, with exceptions for certain new/rehabbed properties, for tax credit properties, and for properties where less than 20% of the units are assisted. RAD transactions will require the CNA e-Tool as the RPCA Tool had been required. Note that RAD transactions using MAP (i.e. HUD-FHA insured mortgage financing) must follow the procedures for CNAs outlined in the 2016 MAP Guide. All other RAD transactions follow the CNA procedures described by the RAD Resource Desk.

B. User Access

Follow the link below to reference HUD’s User Access Guide:
https://www.hud.gov/sites/documents/CNA_ETOOL_FILE_01.PDF.

C. CNA e-Tool Forms & Web Portals

Property Information Form

1. **Question:** What types of HUD CNA activity can users select in the Assessor tool?

   **Answer:** Users must choose a relevant HUD CNA type (Asset Development, Asset Management, and Asset Recapitalization). The relevant program list of property types are dependent on the relevant HUD CNA type mentioned above. For example, if you select Asset Development, then you would be able to choose from 231 Cooperative and LIHTC 221(d)(4) Pilot, among many others. Please see the CNA e-Tool Assessment Tool 1.2 V7 Changes document for more information. https://www.hud.gov/sites/dfiles/Housing/documents/cnaetool_1_2v7.pdf

2. **Question:** Is a Project ID (iREMS) number required for submitting the CNA e-Tool and from where do Lenders obtain this number?

   **Answer:** Yes, a Project ID (iREMS) number is required for submission of the CNA e-Tool. The coordinator generally assigns the user a Project ID (aka: iREMS) number at the time of initial
closing and the asset is added into HUD’s portfolio. For properties that are already in HUD’s portfolio, the Lender should contact his/her Account Executive assigned to the property in Asset Management for this information. The Project ID (iREMS) number is entered on the property information form in the assessment tool. If there is no Project ID (iREMS) number entered, a severe flag will occur upon validation, which will prevent the lender from submitting the CNA.

**Inspection Sample Form**

1. **Question:** For inspection sample density, the MAP Guide says to inspect 25% of the units in a proportional manner and the CNA e-Tool is coded to create flags if 25% of the units in each building and of each type are not inspected. If we see 27% of the total units at the site, they were in most of the buildings, and at least a few of each unit type were inspected, are those W flags going to require us to go back to the site to inspect additional units?

   **Answer:** Generally, HUD is not concerned with minor deviations from the sampling regimen stated in MAP Guide Appendix 5G.V.B.2. In this context, an example of “minor” could mean having a sample that is short by one unit out of the eight that would be required for one building or one-unit type.

   HUD relies on a randomly selected and proportionately distributed sample documented with photography as evidence to evaluate and review the CNA submitted. While it is quite reasonable to disagree about and/or to compromise on judgments about the evidence, it is not reasonable to alter, hide, or compromise the evidence. HUD is suspicious of any significant deviation from the sample routine, repetitive deviations, and/or an inadequate photographic record.

   HUD is concerned that Lenders and Assessors are being too casual about the scope of the CNA and may not be communicating with owners and among themselves in a manner that allows all parties to work efficiently as they adhere to the required scope when preparing the CNA. HUD staff are intolerant of flawed, incomplete evidence and are advised to return CNAs that lack the required photography or depart materially from the sampling regimen.

2. **Question:** What date do we enter for the site visit date if the project is new construction?

   **Answer:** Enter the estimated date of project completion. In FHA projects, this is referred to as ‘final endorsement.’ This date is often 60 days after substantial completion. It is the date when amortization of the loan begins and a property owner would start paying his/her annual deposit.

**Components Form**

1. **Question:** To submit a CNA only for Assets, do we need to include other components such as the roofing or painting of units?

   **Answer:** For Assets, the CNA needs to assess the existing conditions of all the relevant components. This allows for up-to-date information on the replacement schedule and on the budget for anticipated replacements.
2. **Question:** What if there is an item on site that does not appear in the drop-down list? How can a user add a new category?

**Answer:** Users should find the Component Type that most closely resembles what they are working with because users cannot add a new category to the drop-down list.

Alternatives Form

1. **Question:** Can a Lender create new alternatives or modify components to allow choices for repairs not foreseen by the Needs Assessor?

**Answer:** If a Lender would like to create a new alternative, s/he should return the CNA to the Needs Assessor with appropriate instructions and specify a new set of parameters (e.g., when, duration, location, cost, life safety, accessibility, scope).

Repair, Replace, Add New Recommendation Form

1. **Question:** Can a Needs Assessor move an accessibility repair out of the Critical repair category to the Non-Critical repair category so that it can be completed 12 months after closing? If so, how would the Needs Assessor enter this into the CNA e-Tool?

**Answer:** HUD allows Critical repair items to be completed within 12 months after closing on a case-by-case basis, typically for accessibility-related repairs that require construction. HUD will allow this request depending on the severity/type of the repairs.

Within the CNA e-Tool, regardless of the construction timeline, the Needs Assessor should indicate ‘Now’ as the timeline of the repair and indicate ‘Yes’ in the Life Safety and Accessibility Indicator fields and enter a number for the ‘Time To Complete’ field to indicate Critical repairs to be completed post-closing. S/he should also explain his/her proposal to complete this repair post-closing in his/her comments.

2. **Question:** What is the correct entry in the ‘Time to Complete’ field on the Recommendations form when a repair/replace item must be completed before closing?

**Answer:** The correct entry is zero in the ‘Time to Complete’ field.

3. **Question:** One-time repairs/replacements undertaken as part of the scope of work in the CNA e-Tool have caused some skewing of the amounts to be deposited into the replacement reserves. Based on the CNA e-Tool, new carpets and cabinets will have a full replacement show up multiple times in the reserve schedule. We have also seen situations in which a new clubhouse is scheduled to be installed every 10 years (or 3 total times). This has resulted in unusually high minimum annual deposits and many capital items will be replaced or repaired as
needed as opposed to reinstalling every single item in every unit at once, every time the replacement is scheduled.

Would it be possible to change some of these types of repairs to one-time repairs and account for turnover separately? How would this be done in the CNA e-Tool?

Answer: The Estimated Useful Life (EUL) is derived from industry data, and the estimated replacement year in the Reserves for Replacement (RfR) would be based on the EUL. For example, cabinets have an EUL of 20 years. If they are installed as part of the Non-Critical repairs in year 1, the replacement of the cabinets would not appear in the RfR at all since the RfR is scheduled for the first 20 years of the Mortgage term. Carpets, on the other hand, typically last 6 years according to the EUL, so expect them to be replaced at least 3 times within the 20-year schedule.

The new Clubhouse building should be a separate building on the site, so it wouldn’t be a replacement item in the RfR. It would be made up of various components such as the walls, roofing, windows, bathroom fixtures, carpet/flooring, etc. All of the components that make up the Clubhouse would have different EULs. The cost of the new Clubhouse would be the sum of the different components and needs to be structured in the CNA as such.

The whole purpose of the RfR is to estimate potential expenses and capital needs of the property and create a reserves fund that’s always available for the Owner to use. Establishing the Reserves does not mean that a component will be reinstalled automatically, and that the owner will be compelled to do so in every unit all at once, each time.

The duration functionality within the CNA e-Tool exists to enable the owner to spread out the cost over several years rather than put it all in one year. For example, let’s say the cost to replace all the windows at the property, given the per-unit cost, is $200,000. Let’s also say the windows need to be replaced at around Year 8, according to the EUL. You can put the entire $200,000 in Year 8, or spread the costs out over 5 years, with $40,000 a year for 5 years.

4. Question: How do you use the “Duration” function? Is there a specific way or format to enter the number of years for duration?

Answer: Duration is the number of years over which the cost of the recommendations will be spread, in equal amounts. A whole number - never a range and not text - is the only acceptable entry for Duration. An entry other than a whole number will cause a SQL Insertion error. Duration is only used for future repairs.

For some items like appliances, where an average number are proven to be replaced annually, the entry would be a value as close as possible to half the Remaining Useful Life (RUL) of the group of appliances identified as the Component ID. For example, if a component scheduled to be replaced in Year 5 has a Duration of Action of 2, then the cost would be spread out evenly between years three through seven (two years prior [RUL-2], the base year, and two years after [RUL+2]).
The effect of the Duration number entered into the Assessment Tool (Excel file) will take effect when the Assessment Tool is validated in the CNA eTool web portal. To see the validation results, please use the CNA e-Tool public validation engine at the following URL:

https://webapps.hud.gov/CNAeTool/faces/CnaValidation
This link is found on the CNA eTool webpage at the following URL: https://www.hud.gov/program_offices/housing/mfh/cna

5. **Question:** Is there a minimum cost threshold for capital items to be included in a CNA e-Tool, such as a range hood in a common area kitchen at say $135 that is past its EUL and should be replaced? Rural Development has a policy where the CNA Provider need not include any items that have a total cost of $1,000 or less.

**Answer:** The programmatic requirements may vary depending on the reviewing agency of your CNA e-Tool submission (i.e. HUD FHA Mortgage Insurance, RAD, USDA, etc.) so please check with your agency and program office.

For FHA Mortgage Insurance, for instance, there is no minimum dollar amount for capital items. It is assumed that all the components are reserve for replacement items unless the Owner has an established practice of replacing certain items through the operating expense budget. These items must be specified if they are not included in the CNA e-Tool.

**Narrative Form**

1. **Question:** If the Needs Assessor prepares a narrative report outside of the CNA e-Tool and embeds the photos in the report, does the Needs Assessor still have to submit photos in a separate file for the Lender to attach to the CNA e-Tool submission?

**Answer:**
Note: New text is **bolded** to show changes from previous answer. Appendix 5G of the MAP Guide requires that the Needs Assessor assembles photos in an annotated anthology or album, organized in accordance with the ASTM 2018-08 standard outline, with each photo labeled and/or explained. This would typically be done in a text file converted to a PDF file, which the user will attach to the CNA at Submission.

MAP Guide Appendix 5G.VII.D.2.g describes the extent of photos required and how they should be presented. The Administrative Memo issued on July 30, 2018 revised the instruction in the MAP Guide as follows:

“g. Annotated photography for existing properties showing the sites and buildings, unique and typical common spaces, each unit type (but not model units used for marketing purposes) including all rooms and baths, and typical conditions together with any photos necessary to document specific locations and/or the nature or content of immediate repairs. each numbered and labeled and accompanied by such text comments as appropriate. Photos of unit types should include interiors should document not only exceptional conditions (good or bad), but also actual conditions of every 5th dwelling unit inspected including any common areas (hallway, breezeway, elevator) that must be transited to access the unit. If Fair Housing Act covered
units or designated UFAS accessible units are present, provide photographs of one unit of each unit type that is covered or designated. These photos should include documentation of compliance (or not) with dimensional requirements. Where distinct conditions characterize groups of units, (e.g. renovated units vs un-renovated units) provide photos of unit types of each distinct condition as though the distinct condition defined a separate unit type (e.g. 1BR/1BA renovated vs 1BR/ IBA un-renovated). Annotate or label photos indicating location (building and/or unit number or location on site) as well as the description of the photographed object and relevant comments, if any.

While photos or text documents may be attached to address a particular component or topic, it is recommended that the Needs Assessor and/or Lender assemble photography and comments in a single or multiple PDF documents organized by Need Category, i.e. by ASTM outline, e.g. 3.2 Site, 3.3 Mechanical Electrical Systems, etc. These attachments should cover all Need Categories identified at the property. from 3.2 through 4.0. See the Standard Estimated Useful Life Table.”

HUD specifically does not want submitters to attach traditional PCNA reports, or multiple exhibit items in a single file, as this results in the reviewer being unable to see quickly what has been attached and requires the reviewer to open, search, and find a particular exhibit among many. When the reviewer opens the Attachments panel for a submitted CNA, s/he should be able to scan the list of attachments and readily understand the identity of each item, as though the list were a table of contents for the CNA appendices.

**EPA Portfolio Manager**

1. **Question:** What is the EPA ENERGY STAR Portfolio Manager?

   **Answer:** EPA's ENERGY STAR Portfolio Manager Tool helps owners measure and track the energy, water use, and greenhouse gas emissions of their buildings in a secure online environment. The owner can use the results to identify under-performing buildings, set investment priorities, verify efficiency improvements, and receive EPA recognition for superior energy performance. More information can be found at the following URL:

2. **Question:** What is the HUD Custom SEDI for and where can I find it?

   **Answer:** The HUD Custom SEDI is used for properties to be built, adaptively reused, or rehabilitated. It is found at the following URL:

3. **Question:** What is the HUD Custom SEP for and where can I find it?

   **Answer:** The HUD Custom SEP is used for existing properties with a recent full 12 months of normal operating history. It is found at the following URL:
4. **Question:** Unless an applicant is aiming for a reduced MIP, does s/he need a SEP for submission of the CNA e-Tool for a 223(f) project?

**Answer:** No. In September 2017, HUD’s Office of Multifamily Housing suspended the sections of the 2016 MAP Guide that required applicants for insured mortgages to provide utility consumption benchmarking reports, i.e. HUD Custom SEP or SEDI reports from EPA’s Portfolio Manager application. However, this suspension does not apply to any applicant who requests a reduced Mortgage Insurance Premium (MIP) in consequence of achieving a green building certification, or to those applicants who ask that HUD underwrite utility cost savings anticipated as a result of proposed utility conservation measures included in Critical or Non-Critical repairs. HUD still requires benchmarking reports in those circumstances.

HUD will not lift the suspension of the benchmarking provisions of the MAP Guide without timely notice to the industry, so applicants have sufficient time to respond in future applications.

**Web Portals**

1. **Question:** Where can I find the Assessor tool and public Validation Engine?

   **Answer:** Users can find the CNA Assessment Tool on the CNA e-Tool web page at the following URL: [https://www.hud.gov/program_offices/housing/mfh/cna](https://www.hud.gov/program_offices/housing/mfh/cna). Users can access the public Validation Engine website without credentials at the following URL: [http://webapps.hud.gov/CNAeTool/faces/CnaValidation](http://webapps.hud.gov/CNAeTool/faces/CnaValidation).

2. **Question:** Which browsers are compatible with the CNA e-Tool?

   **Answer:** The CNA e-Tool is compatible with the following web browsers: Microsoft Internet Explorer, Google Chrome, Mozilla Firefox, and Apple Safari.

**Submission Process**

1. **Question:** How does the CNA e-Tool submission/approval process correlate with the application process? Does HUD need to approve the CNA e-Tool prior to a firm’s application or concurrent to its application?

   **Answer:** In terms of timing, the CNA e-Tool submission process is very similar to the legacy paper based process. HUD still requires the full application and check, however the CNA portion of the application will be reviewed electronically.

2. **Question:** Why can only Lenders submit a CNA?

   **Answer:** HUD has a legal relationship with the Lender. The Needs Assessor is a third party with whom HUD has no direct relationship.
3. **Question:** Is the process for preparing a CNA different for a vendor and for a servicer when preparing a CNA for the 10-year PCNA requirement?

**Answer:** There is no difference in procedure for preparing a CNA for a loan application as opposed to a 10-year update CNA. The Assessment Tool spreadsheet and the CNA e-Tool Portals (Validation Engine for Needs Assessors and Submission Portal for Lenders) will be used the same way in each instance.

4. **Question:** Can Needs Assessors keep local copies of the Assessor tool data for their own use or is it preferred that they view the data through the HUD Portal?

**Answer:** The Needs Assessor should save all the final items they send to the Lender as local copies to have record of what they submitted.

5. **Question:** Is there a limit to the number and size of attachments? What type of files can be submitted as attachments?

**Answer:** A user can upload as many attachments as required, but the size limit for each is 10MB. The following file types can be accepted: image files such as JPEG, PDF and/or Word, and Excel documents.

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**Flags**

1. **Question:** What kinds of flags can occur when the CNA e-Tool is validated? Where can users find a list of all flag codes that may occur?

**Answer:** There are over a hundred flags that can be (S) severe, (W) warning, or (I) informational in nature. Users can find the list of flags that may trigger during the Validation process at the following URL (under Appendix A):


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**Reports**

1. **Question:** What reports are available to external users?

**Answer:** External users have access to the following reports: the Snapshot Report, the Property Insurance Schedule Report, the Assessment Summary Report, and the Building Unit Mix Report.

The Snapshot Report gives an overview of the data captured in the assessment. This report is only available on the Locate CNA tab of the Submission Portal, for those external users with credentials.

The Property Insurance Schedule Report is a report that consists of the Property Insurance Schedule of Replacement Cost (HUD Form 92329).
The Assessment Summary Report is the closest thing available to mirror a written CNA. This Report was modeled after the USDA Standard CNA.

The Building Unit Mix Report is a summary of all buildings entered into the CNA e-Tool and includes information on the unit types in the building, square footage per unit type, the number of units/spaces in the building, the total square footage, and the number of garage spots.

**Web Portal Data Retention**

1. **Question:** How long will the database retain a CNA file?

   **Answer:** The database will retain CNA files depending on the following statuses:
   - *Received for Validation:* 4 days if submitted by Validation Engine user, 30 days when submitted by Submission Portal user.

2. **Question:** Will re-submitting a corrected version of the CNA e-Tool delete and disallow access to the original CNA e-Tool?

   **Answer:** Re-submitting a copy of the CNA e-Tool for the same property will not overwrite or delete the previously approved CNA because the database stores each approved CNA as a separate individual record with its own unique Assessment ID.

3. **Question:** What do I do with a returned CNA file that is received from HUD?

   **Answer:** Each CNA submitted to HUD through the Lender’s submission portal is given a unique data record number in the database called the “Assessment ID.” When a CNA is returned by HUD, that CNA data record is given a ‘Returned’ status. The original Submitter can locate this returned CNA within his/her Lender’s portal to view. By saving this CNA record as a Draft (Save as Draft), the Submitter can add attachments and edit the flag responses to resubmit. Please note that any changes to the actual CNA data that requires changes made to the Assessment Tool (excel file) would require a new validation and submission effort.

**Outdated Versions of the Assessor Tool**

1. **Question:** How will users know if there is a new version of the Assessor tool? If HUD releases a new version of the Assessor tool, will there be issues with later validation?

   **Answer:** HUD will post Operational Bulletins informing users when a new Assessor tool is posted. Newer versions of the Validation Engine may or may not be able to validate older versions of the Assessor tool.
Locate CNA

1. **Question:** What is the purpose of the ‘Locate CNA’ tab?

   **Answer:** Under the ‘Locate CNA’ tab, the user is able to locate, select, and open results for any CNA that this same user has validated or submitted, including any that the reviewing agency has returned or approved. The user can export and print their CNA results after locating their CNA.

Assessor Requirements

1. **Question:** If the Needs Assessor completes the CNA in-house, does the Needs Assessor preparing the CNA need to be qualified/certified or does this only apply to third parties?

   **Answer:** Any personnel completing the CNA must be qualified with necessary professional certifications and licenses to conduct the Needs Assessment. The Needs Assessor may not have any identity-of-interest with the Lender or the Borrower as stated in the MAP Guide 5.2.B.2:

   2. **Needs Assessors.**
      a. **Qualifications.**
      The Lender must select a Needs Assessor it determines to have education, professional credentials, and field experience appropriate to the assessment assignment considering the age, size, type of building systems, construction methods, and location of the property. In no event may the qualifications of the Needs Assessor and any related consultants employed to prepare the CNA be less than described in ASTM E 2018-08 Appendix XI.1. The Needs Assessor (and any other consultants, specialists or trades contractors engaged for purposes of the needs assessment) may have no identity-of-interest with the Lender or the borrower or its principals, and may not have any personal or business relationship with the borrower, or its principals that would create a conflict of interest.

2. **Question:** What type of training do I need to be certified as a Needs Assessor?

   **Answer:** HUD does not specify what kinds of training someone needs to gain the proper qualifications as prescribed above.

D. Resources

Estimated Useful Life Table

1. **Question:** What does EUL mean and where can I find EUL values?

   **Answer:** The Estimated Useful Life (EUL) Table lists the recommended average useful life of the categories of assets that should be considered in a Capital Needs calculation. You can find the EUL table in Appendix C of the Instruction Guide at the following URL:
MAP Guide

1. **Question:** What is the Multifamily Map Guide and where can users find it?

   **Answer:** The Multifamily Accelerated Processing (MAP) Guide is intended to reduce the time required to approve loan applications and to assure consistent application of program requirements and credit standards across all HUD processing offices. FHA's new MAP Guide delegates more underwriting responsibility to approved "MAP Lenders" and includes all relevant guidance published by FHA since the MAP Guide was last updated in 2011. Users can find it at the following URL: [https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/guideboks/hsg-GB4430](https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/guideboks/hsg-GB4430).

Operational Bulletins

1. **Question:** What is an Operational Bulletin and where can users find it?

   **Answer:** Operational Bulletins provide CNA e-Tool stakeholders with updates and guidance. Users can find them under the heading ‘Operational Bulletins’ at the following URL: [https://www.hud.gov/program_offices/housing/mfh/cna](https://www.hud.gov/program_offices/housing/mfh/cna)

Rules of Behavior

1. **Question:** What are the Rules of Behavior (ROB) Requirements for the CNA e-Tool and where can users find this?

   **Answer:** The ROB applies to the system users and lists specific responsibilities and expected behavior of all individuals with access to or use of the named information system. In addition, the ROB outlines the consequences of non-compliance and/or violations. Those who require Secure Systems Access and receive an H ID, C ID, M ID, or I ID credential and password must complete the Rules of Behavior. Users can find it in Appendix A of the User Access Guide at the following URL: [https://portal.hud.gov/hudportal/documents/huddoc?id=AccessGuide_3.10.17.PDF](https://portal.hud.gov/hudportal/documents/huddoc?id=AccessGuide_3.10.17.PDF).