Streamlined Annual PHA Plan (High Performer PHAs) U.S. Department of Housing and Urban Development Office of Public and Indian Housing U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires: 02/29/2016

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. Form HUD-50075-HP is to be completed annually by **High Performing PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, HCV-Only PHA, Small PHA, or Qualified PHA do not need to submit this form.

Definitions.

- (1) High-Performer PHA A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers and was designated as a high performer on both of the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments.
- (2) Small PHA A PHA that is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled, and that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) Housing Choice Voucher (HCV) Only PHA A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) Standard PHA A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) Troubled PHA A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) Qualified PHA A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled

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В.	Annual Plan Elements
B.1	Revision of PHA Plan Elements.
	(a) Have the following PHA Plan elements been revised by the PHA since its last Annual PHA Plan submission?
	Y N
	(b) The PHA must submit its Deconcentration Policy for Field Office Review. The City of Flagstaff Housing Authority is exempt from this policy per 24 CFR 903.2(b)2(iii)
	(c) If the PHA answered yes for any element, describe the revisions for each element below:
B.2	New Activities.
	(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?
	Y N
	☐ ☑ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).
	(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.
	The City of Flagstaff Housing Authority is exploring the possibility of converting a portion of the voucher allocation to project based in order to better serve clients and utilize the vouchers throughout the community. Locations and numbers have yet to be identified.
	The City of Flagstaff Housing Authority is exploring the possibility of participating in a RAD conversion and is currently on the Waiting List. As part of this process we are exploring various avenues to reposition our assets including Mixed Finance Development and Demo/Dispo.
	The City of Flagstaff Housing Authority is performing modernization and capital repairs on units during vacancy to address infrastructure issues, aging components and accessibility needs. Transfers of existing Residents to vacant units is being performed in worst case scenario needs. Such transfers may be temporary or permanent based on the needs of the Resident and Resident choice.

B.3 Progress Report.

Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year Plan.

Goal One: Manage CFHA's Section 8 Housing Choice Voucher (S8HCV) and public housing programs in an efficient and fiscally sustainable manner that will result in full compliance with all applicable statutes and regulations and provide excellent service.

Objectives:

- 1. CHFA shall continue to meet all criteria for recognition as a high performer in HUD's PHAS and SEMAP assessment systems.
- 2. Promote a motivating, dynamic and innovative work environment with a capable and efficient team of employees to operate as a Resident friendly and fiscally prudent leader in the affordable housing industry as measured by Resident surveys, employees and HUD scoring
- 3. Provide the staff with training to stay abreast of regulatory changes and best practices.
- 4. Review organizational structure and staffing levels to ensure fiscal responsibility, staff satisfaction and retention. and appropriate staffing levels that provide excellent service.
- 5. Maintain policies and procedures in compliance with current HUD standards and regulations.
- 6. To the extent allowed by federal regulation, align the policies and procedures of the Section 8 HCV and public housing programs.
- 7. Explore the possibility of becoming a Moving to Work (MTW) agency to streamline operations, provide better service, reduce Applicant and Resident administrative burdens, reduce administrative costs and better meet local housing needs. A letter of interest with HUD for MTW Cohort 1 has been filed, and if not selected for this cohort, we will continue to investigate participation in later MTW cohorts.
- 8. Participate in industry groups to remain abreast of current trends and changes, and to provide input on such changes

The City of Flagstaff Housing Authority has maintained its rating of High Performer and is meeting all objectives under Goal One.

The City of Flagstaff Housing Authority has begun reorganization of the Maintenance Dept. and is currently working on revision of the agency's organizational structure.

The City of Flagstaff Housing Authority was not selected for MTW cohort 1 but is participating as a control participant. Decision to seek inclusion in future cohorts will be made on a case by case basis.

Goal Two: Provide a safe, drug free and secure environment in CFHA's public housing developments.

Objectives:

- 9. CFHA shall continue to maintain practices which encourage low crime rates in its developments. This will be accomplished by continuing to contract with the Flagstaff Police Department to have a full-time officer assigned to our developments.
- 10. Monitor and maintain our rate of eviction due to violations of criminal law by maintaining thorough screening policies and procedures that balance the need for public safety with resident rights protected under HUD's Disparate Impact Memo

Flagstaff Housing Authority is meeting both Goal Two and the objective.

Goal Three: Maintain the CFHA's real estate in habitable, safe, decent and sanitary conditions.

Objectives:

- 11. CFHA shall maintain a resident friendly, non-institutional and accessible environment in its developments as measured by regular customer surveys and formal annual resident input and participation.
- 12. CFHA shall maintain public housing units in compliance with all local and HUD requirements. This will be accomplished as follows:
 - a. Continue to use Capital Funds to maintain facilities, and systems, improve accessibility in homes and on the grounds and replace aging equipment.
 - b. Provide training on an annual basis for Maintenance Staff to allow them to grow professionally.
 - c. Provide training prior to occupancy for public housing residents in the care for and use of their residence.
 - d. Place emphasis of quality of unit turnover ahead of speed of unit turnover
 - e. Explore options to redevelop and expand affordable housing stock including HUD's Rental Assistance Demonstration (RAD) program.

The City of Flagstaff Housing Authority is meeting both Goal Three and the objectives.

The City of Flagstaff Housing Authority has realigned the Maintenance Dept. to allow for efficiency and opportunity for growth and training. This is an ongoing process.

The City of Flagstaff Housing Authority has released an RSOQ to identify potential partners for redevelopment. Responses are due June 15, 2021.

Goal Four: Ensure the range and quality of housing choices available to participants in the CFHA's tenant-based assistance programs is as broad as possible.

Objectives:

- 13. CFHA shall continue to investigate establishment of a program in partnership with local nonprofits to help eligible participants become homeowners with the use of Housing Choice Vouchers.
- 14. The CFHA shall partner with others to offer quality affordable rental opportunities to our community.
- 15. Consider implementation of a program to provide assistance with security deposit and certain move-in expenses, such as utility hook-ups.
- 16. Maintain a budget utilization rate of 98% for tenant-based programs.
- 17. Investigate the development of a project-based assistance program.
- 18. Hold regular Landlord outreach and appreciation events.
- 19. Partner with local nonprofits to investigate the possibility of obtaining special purpose vouchers and/or provide project-based vouchers.
- 20. Continue current SRO Section 8 assistance in partnership with the Guidance Center to house SMI individuals.
- 21. Continue to administer VASH Vouchers for homeless veterans; seek additional VASH Vouchers from HUD as appropriate and available.
- 22. Pursue use of the Foster Youth Initiative Program to provide Housing Choice Vouchers to youth who have exited or are exiting the foster care system who are homeless or at risk of homelessness.

The City of Flagstaff Housing Authority is working toward increasing affordable opportunities in the community. Progress has been specifically made on objectives 2, 3, 4, 5, and 6.

The City of Flagstaff Housing Authority has received Board and City Council approval to use funding for a Security Deposit Assistance Program.

The City of Flagstaff Housing Authority is implementing a Landlord Portal to provide greater access by our Landlord partners.

The City of Flagstaff Housing Authority has received 40 Mainstream Vouchers.

The City of Flagstaff Housing Authority has received 2 FYI Vouchers, has referred an additional Foster Youth to DCS for vetting and continues to work with DCS and community partners to identify additional potentially eligible Foster Youth. The City of Flagstaff Housing Authority has identified community partners to assist youth with some costs.

Goal Five: Ensure community connectivity to services, facilities and amenities is maintained and enhanced as appropriate. This includes physical linkages to area parks, the Flagstaff Urban Trail System (FUTS) and other community amenities, as well as interactions with area schools and organizations.

Objectives:

- 23. Utilize the Siler Homes Activity Center as a base for various resident services
- 24. Work toward expanding staff knowledge of and relationships with community programs, family and youth services and activities to include job related training and career developments to allow them to provide accurate and appropriate referrals
- 25. Seek to continue to work with our community partners to provide youth activities and drug prevention programs.
- 26. Continue to contract with the Flagstaff Police department to have a full-time officer assigned to our developments to promote Community based policing to minimize criminal and drug activity This program has been extremely successful over the years.
- 27. Continue to partner with Head Start to provide early childhood education at our sites.

Progress on Goal Five is well underway and is part of a continuous process. The SHAC (Obj. 1) is being utilized as a youth recreation center in a partnership between The City of Flagstaff Housing Authority and City of Flagstaff Recreation programs. A full-time police officer is assigned to the developments.

Goal Six: Educate community regarding who lives in affordable housing and their contributions to our community in order to create a positive image of our programs.

Objectives:

- 28. The CFHA Board of Commissioners, Executive Director and Staff shall speak to civic, religious and fraternal groups periodically to explain how important public housing is to the community.
- 29. Maintain our web page so that the public has access to information regarding our programs and history.
- 30. Provide web-based access to the application and recertification processes.

- 31. Make periodic presentations to the City Council regarding the need for expansion of the housing stock for low-income families. Flagstaff is a high cost area with a low wage base.
- 32. Participate in the local Continuum of Care to improve partnerships and communication with affordable housing/homelessness prevention stakeholders.

Goal Six is ongoing. Web-based access to the application process has been implemented, however a change in web-based tools is currently in process due to the quality and usability for the Applicant of the current product. Web-based recertification process is not being pursued at this time based on the quality and usability of the products available, as well as Resident concerns with technology identified during the current modified procedure during Covid 19.

Goal Seven: Investigate and pursue redevelopment expansion of affordable housing.

Objectives:

- 33. Participate in and support local groups dedicated to affordable housing.
- 34. Complete and issue an RSOQ for a RAD development partner
- 35. Investigate use of alternative funding sources such as National Housing Trust Fund Low-Income Tax Credits, HOME funds, etc. for financing affordable housing redevelopment and expansion.
- 36. Partner with local nonprofits to investigate the possibility of obtaining special purpose vouchers and/or provide project-based vouchers.
- 37. Organizational efficiencies, new management structure, salary savings.

As Goal Seven is duplicative of elements of other goals further comment is not necessary.

B.4.	Most Recent Fiscal Year Audit.
	(a) Were there any findings in the most recent FY Audit?
	Y N □ ⊠ (b) If yes, please describe:
	(b) If yes, please describe.
	Other Document and/or Certification Requirements.
C.1	Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan
	Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.2	Civil Rights Certification.
	Form 50077-ST-HCV-HP, Certification of Compliance with PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	Resident Advisory Board (RAB) Comments.
	(a) Did the RAB(s) provide comments to the PHA Plan?
	Y N □ ⊠
	If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
	Public meetings were held March 18, 19 and 20 and a Public Hearing was held on April 1. Members of the RAB attended the March 18 and March 20 meetings. A summary of Resident involvements and comments has been submitted.
C.4	Certification by State or Local Officials.

Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the

PHA as an electronic attachment to the PHA Plan.

D	Statement of Capital Improvements . Required in all years for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).
D.1	Capital Improvements. See HUD Form 50075.2 approved by HUD on 04/25/2019.



Instructions for Preparation of Form HUD-50075-HP Annual Plan for High Performing PHAs

- PHA Information. All PHAs must complete this section.
 - A.1 Include the full PHA Name, PHA Code, PHA Type, PHA Fiscal Year Beginning (MM/YYYY), PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type, and the Availability of Information, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

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1	Revision of PHA Plan Elements. PHAs must:
	Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no."
	Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income), (ii) elderly families and families with disabilities, and (iii) households of various races and ethnic groups residing in the jurisdiction or on the waiting list based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent it pertains to the housing needs of families that are on the PHA's public housing and Section 8 tenant-based assistance waiting lists. 24 CFR §903.7(a)(1) and 24 CFR §903.12(b).
	Deconcentration and Other Policies that Govern Eligibility, Selection and Admissions. Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR \$903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. 24 CFR \$903.7(b) Describe the PHA's procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists. 24 CFR \$903.7(b) A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR \$903.7(b) Describe the unit assignment policies for public housing. 24 CFR \$903.7(b)
	Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c)
	Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d)
·	☐ Homeownership Programs. A description of any homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. For years in which the PHA's 5-Year PHA Plan is also due, this information must be included only to the extent that the PHA participates in homeownership programs under section 8(y) of the 1937 Act. (24 CFR §903.7(k) and 24 CFR §903.12(b).
	□ Safety and Crime Prevention (VAWA). A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))
	Pet Policy. Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))
	☐ Substantial Deviation. PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i)
	☐ Significant Amendment/Modification. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. Should the PHA fail to define 'significant amendment/modification', HUD will consider the following to be 'significant amendments or modifications': a) changes to rent or admissions policies or organization of the waiting list; b) additions of non-emergency public housing CFP work items (items not included in the current CFP Annual Statement or CFP 5-Year Action Plan); or c) any change with regard to demolition or disposition, designation, homeownership programs or conversion activities. See guidance on HUD's website at: Notice PIH 1999-51. (24 CFR §903.7(r)(2)(ii)
	If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

- New Activities. If the PHA intends to undertake any new activities related to these elements or discretionary policies in the current Fiscal Year, mark "yes" **B.2** for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no." ☐ Hope VI. 1) A description of any housing (including project name, number (if known) and unit count) for which the PHA will apply for HOPE VI; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30) Mixed Finance Modernization or Development. 1) A description of any housing (including name, project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm. (Notice PIH 2010-30) Demolition and/or Disposition. Describe any public housing projects owned by the PHA and subject to ACCs (including name, project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo dispo/index.cfm. (24 CFR §903.7(h)) ☐ Conversion of Public Housing. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/conversion.cfm. (24 CFR §903.7(j)) Project-Based Vouchers. Describe any plans to use HCVs for new project-based vouchers. (24 CFR §983.57(b)(1)) If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan.
- B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

☑ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

B.4 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements

- C.1 Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 SM-HP.
- C.2 Civil Rights Certification. Form HUD-50077 SM-HP, PHA Certifications of Compliance with the PHA Plans and Related Regulation, must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o))
- C.3 Resident Advisory Board (RAB) comments. If the RAB provided comments to the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)
- C.4 Certification by State or Local Officials. Form HUD-50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR \$903.15)
- D. Statement of Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section. (24 CFR 903.7 (g))
 - D.1 Capital Improvements. In order to comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan. PHAs can reference the form by including the following language in Section C. 8.0 of the PHA Plan Template: "See HUD Form 50075.2 approved by HUD on XX/XX/XXXX."

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission, goals and objectives for serving the needs of low-income, very low-income, and extremely low-income families.

Public reporting burden for this information collection is estimated to average 16.64 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.