

# Office of Human Rights FY2018

## FY2018 Performance Accountability Report

The Performance Accountability Report (PAR) measures each agency's performance for the fiscal year against the agency's performance plan and includes major accomplishments, updates on initiatives, and key performance indicators (KPIs).

## Mission

The mission of the DC Office of Human Rights (OHR) is to eradicate discrimination, increase equal opportunity, and protect human rights in the city.

## Summary of Services

The DC OHR investigates and resolves complaints of discrimination in employment, housing, places of public accommodation, and educational institutions, pursuant to the DC Human Rights Act of 1977 and other numerous local and federal laws. OHR also prevents discrimination by providing training and educating DC government employees, private employers, workers, and the community at-large of their rights and responsibilities under the law. OHR monitors compliance with the Language Access Act of 2004 and investigates allegations of noncompliance with this Act by DC government agencies and houses the District's Citywide Bullying Prevention Program. The agency also investigates complaints and conditions causing community tension and conflict that can lead to breaches of the peace. The Commission on Human Rights is the adjudicatory body that decides private sector cases after OHR has found probable cause of discrimination.

## FY18 Top Accomplishments

What is the accomplishment that your agency wants to highlight?	How did this accomplishment impact residents of DC?	How did this accomplishment impact your agency?
OHR commemorated the 40th Anniversary of the D.C. Human Rights Act through a video and annual report commemorating the occasion.	Reminded residents of the various protections afforded to residents under the Human Rights Act and of the city's continued commitment to ensuring that the human rights of all residents are protected.	Provided opportunity for the agency to look back at its many accomplishments over the years and re-energized employees to continue to improve and enhance the services that OHR provides to the community.
OHR established a separate and distinct Intake Unit to handle OHR's large volume of inquiries and docketed complaints and eliminate delays in processing.	Residents had their inquiries and complaints addressed in a more efficient manner, which enhances their overall opinion of how OHR functions and serves their needs.	Since hiring OHR's new role of Intake Manager, OHR has seen improved results – specifically, in the percent of inquiries that were scheduled for intake interview within 30 days (23.6% Q2, 44.1% Q3, 60.5% Q4). The new unit is also able to prepare for pending legislative amendments that will again increase the volume of inquiries and complaints.
OHR scheduled 100% of mediations within 45 days of case docketing.	Complaints filed by residents are quickly scheduled for discussion and potential resolution between the parties. This results in improved and expedited outcomes for residents seeking relief through OHR's case process.	All stages of OHR's case process can better adhere to the proscribed timelines in the regulations when mediations are scheduled and held soon after case docketing.

## 2018 Strategic Objectives

Objective Number	Strategic Objective

Objective Number	Strategic Objective
1	Provide high quality and efficient resolution of complaints filed at the Office of Human Rights in order to comply with statutory requirements, improve customer service, and strengthen enforcement.
2	Provide high quality and efficient adjudication of certified charges filed at the Commission on Human Rights in order to comply with statutory requirements and to improve customer service
3	Provide high quality monitoring of and technical assistance in OHR's compliance programs, including Language Access, Bullying Prevention, and Equal Employment Opportunity policies.
4	Provide high quality education and awareness communication to the public in order to increase understanding of the laws enforced by OHR
5	Create and maintain a highly efficient, transparent and responsive District government.**

## 2018 Key Performance Indicators

Measure	Freq	Target	Q1	Q2	Q3	Q4	FY2018	KPI Status	Explanation
<b>1 - Provide high quality and efficient resolution of complaints filed at the Office of Human Rights in order to comply with statutory requirements, improve customer service, and strengthen enforcement. (6 Measures)</b>									
Percent of Office of Human Rights cases certified to the Commission on Human Rights within 60 days	Quarterly	80%	62.5%	100%	0%	28.6%	42.1%	Unmet	The ability to meet this target is often prevented for reasons outside of OHR's control, including the respondent filing a reconsideration request, the parties seeking to reschedule mandatory consideration conciliation, the parties requesting additional time to reach settlement after conciliation, the 30-day timeframe in which OHR has to assist a pro se claimant in obtaining an attorney prior to certifying case to the Commission, and the time it takes to translate a letter of determination to the primary language of the claimant.
Percent of assigned cases at the Office of Human Rights with letters of determination within 160 days	Quarterly	80%	20.9%	21.2%	48.2%	26.8%	32.3%	Unmet	OHR had a vacancy in the Investigations Manager from May 2018 through August 2018. During this time, OHR restructured the unit into teams, which briefly increased production and efficiency (Q3 - 48.2%). Q4's closure rate decreased, which was likely a result of transitioning the new Investigations Manager into OHR. We expect that this number will begin to increase in FY19 with a case management system which will enable the Investigation Manager to better track and move cases forward.
Percent of inquiries filed at the Office of	Quarterly	80%	34.3%	23.6%	44.1%	60.5%	45.7%	Unmet	OHR had a vacancy in the Intake Supervisor role in Q1, Q2, and Q3, and as a result,

Measure	Freq	Target	Q1	Q2	Q3	Q4	FY2018	KPI Status	Explanation
Human Rights scheduled for intake interview within 30 days									struggled with this KPI; however, OHR hired and trained a new Intake Supervisor in late Q3, who has been diligently working to ensure we meet or exceed this measure. OHR has already seen improvements as the Q4 scheduling rate was 60.5%, compared to 44.1% in Q3, 23.6% in Q2, and 34.3% in Q1.
Percent of docketed cases at the Office of Human Rights scheduled for mediation within 45 days	Quarterly	80%	100%	100%	100%	100%	100%	Met	
Cost of processing an Office of Human Rights complaint under the Equal Justice Program	Annually	\$5870	Annual Measure	Annual Measure	Annual Measure	Annual Measure	\$6611	Neutral Measure	
Percent of EEOC cases resolved at the Office of Human Rights	Quarterly	New Measure	140%	98%	76%	106%	105%	No Target Set	
<b>2 - Provide high quality and efficient adjudication of certified charges filed at the Commission on Human Rights in order to comply with statutory requirements and to improve customer service (3 Measures)</b>									
Percent of dispositive motions at the Commission on Human Rights resolved within 60 days of filing	Quarterly	80%	No applicable incidents	0%	100%	0%	30%	Unmet	This KPI has been difficult to achieve due to the briefing/hearing schedule that follows an initial filing of a dispositive motion, resulting in the Commission not receiving complete arguments from both parties until shortly before or after the 60 day mark.
Percent of Commission on Human Rights cases pending over 15 months	Quarterly	20%	17.9%	14.3%	16.7%	18.2%	16.8%	Met	
Percent of Commission on Human Rights cases with scheduling orders issued within 30 days	Quarterly	80%	100%	100%	100%	100%	100%	Met	

Measure	Freq	Target	Q1	Q2	Q3	Q4	FY2018	KPI Status	Explanation
<b>3 - Provide high quality monitoring of and technical assistance in OHR's compliance programs, including Language Access, Bullying Prevention, and Equal Employment Opportunity policies. (4 Measures)</b>									
Percent of EEO Counselors and Officers Satisfied with Training	Annually	80%	Annual Measure	Annual Measure	Annual Measure	Annual Measure	100%	Met	
Percent of covered entities with major public contact monitored and assessed for compliance with the Language Access Act	Annually	80%	Annual Measure	Annual Measure	Annual Measure	Annual Measure	100%	Met	
Percent of language access cases which receive initial intervention within 30 days	Annually	90%	Annual Measure	Annual Measure	Annual Measure	Annual Measure	100%	Met	
Percent of informal intervention provided in bullying cases within 30 days of reporting	Annually	80%	Annual Measure	Annual Measure	Annual Measure	Annual Measure	100%	Met	
<b>4 - Provide high quality education and awareness communication to the public in order to increase understanding of the laws enforced by OHR (3 Measures)</b>									
Percent of participants that rate the Business Training Series events as "good" or "excellent" in post-training survey	Annually	80%	Annual Measure	Annual Measure	Annual Measure	Annual Measure	0%	Unmet	Due to staff turnover and change in unit leadership, there was an oversight in the collection of surveys at the conclusion of the training series. As a result, surveys were not consistently collected to track this measure.
Percent of Human Rights Liaisons that rate the all-day training as "good" or "excellent" in	Annually	80%	Annual Measure	Annual Measure	Annual Measure	Annual Measure	0%	Unmet	Due to staff turnover and change in unit leadership, there was an oversight in the collection of surveys at the conclusion of the training program. As a result, surveys were not consistently collected to track this measure.

Measure	Freq	Target	Q1	Q2	Q3	Q4	FY2018	KPI Status	Explanation
post-training survey									
Percent of participants that rate "Know Your Rights" presentations as "good" or "excellent" in post-training survey	Annually	80%	Annual Measure	Annual Measure	Annual Measure	Annual Measure	0%	Unmet	Due to staff turnover and change in unit leadership, there was an oversight in the collection of surveys at the conclusion of the presentations. As a result, surveys were not consistently collected to track this measure.

\*\*We've revisited a project to standardize District wide measures for the Objective "Create and maintain a highly efficient, transparent and responsive District government." New measures will be tracked in FY18 and FY19 and published starting in the FY19 Performance Plan.

## 2018 Workload Measures

Measure	Freq	Q1	Q2	Q3	Q4	FY 2018
<b>1 - Intake (3 Measures)</b>						
Number of Inquiries Received	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	1483
Number of intakes scheduled	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	681
Number of Intakes Conducted	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	563
<b>1 - Investigate (2 Measures)</b>						
Number of New Docketed Cases	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	355
Number of pending cases	Quarterly	588	600	600	577	577
<b>1 - Legal Review (5 Measures)</b>						
Number of Final Determinations Reviewed	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	164
Number of Motions Reviewed	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	247
Number of Litigation Cases Reviewed	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	25

Measure	Freq	Q1	Q2	Q3	Q4	FY 2018
Number of Cases Reviewed	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	547
Number of FOIA Requests Received	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	111
<b>1 - Mediation (2 Measures)</b>						
Number of Cases Mediated	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	521
Number of cases scheduled for mediation	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	448
<b>2 - Hold Hearings Including Final Hearings (2 Measures)</b>						
Number of Final Hearings Held	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	16
Number of Non-Final Hearings Held	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	62
<b>2 - Lead or Organize Commission Meetings (1 Measure)</b>						
Number of Commission Meetings Per Year	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	6
<b>2 - Review and rule on dispositive motions (2 Measures)</b>						
Number of Motions	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	11
Number of Cases Remanded	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	4
<b>2 - Review Certified Cases (1 Measure)</b>						
Number of Certified Cases Received	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	19
<b>3 - Bullying Prevention Policy Oversight (2 Measures)</b>						
Number of Covered Entities under Youth Bullying Prevention Act	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	324
Number of Youth Bullying Prevention Outreach and Education Activities	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	37
<b>3 - Community Engagement (3 Measures)</b>						

Measure	Freq	Q1	Q2	Q3	Q4	FY 2018
Number of Community Education/Outreach Activities	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	48
Number of Meetings with Consultative Agencies	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	10
Number of Meetings with LA Stakeholders	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	7
<b>3 - Compliance Monitoring (1 Measure)</b>						
Number of Language Access Coordinator Meetings Held	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	6
<b>3 - EEO Counselors and Officers Training (3 Measures)</b>						
Number of EEO Counselors and Officers in the District	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	111
Number of EEO Trainings Held	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	8
Number of Affirmative Action Review Requests	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	717
<b>3 - Enforcement (3 Measures)</b>						
Number of LA Inquiries Received	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	20
Number of LA Complaints Docketed	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	1
Number of Language Access inquiries and cases resolved.	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	16
<b>3 - School Climate Data and Youth Bullying Prevention Project (1 Measure)</b>						
Number of YBP Outreach and Education Activities	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	37
<b>3 - Technical Assistance to Covered Entities (4 Measures)</b>						
Number of Covered Entities under the Language Access Act	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	63
Number of Covered LA Entities with Major Public Contact	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	39
Number of LA Trainings	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	33

Measure	Freq	Q1	Q2	Q3	Q4	FY 2018
Number of Non-Compliant LA Entities	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	Waiting on Data
<b>4 - Perform Outreach (4 Measures)</b>						
Number of Overall Outreach Activities	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	91
Number of Fair Housing Outreach Activities	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	54
Number of Unemployed Anti-Discrimination Act Outreach Activity	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	14
Number of FCRSA Outreach Activities	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	49
<b>4 - Provide education/training (2 Measures)</b>						
Number of Business Training Series	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	27
Number of Human Rights Liaisons Trained	Annually	Annual Measure	Annual Measure	Annual Measure	Annual Measure	22

## 2018 Strategic Initiatives

Title	Description	Complete to Date	Status Update	Explanation
<b>BULLYING PREVENTION OVERSIGHT (3 Strategic initiatives)</b>				
Program Oversight	In FY18, the Mayor's Youth Bullying Prevention Program will launch a new initiative focusing on youth social media activities and develop an evidence based strategies for teaching kids on how to be safe when accessing social media.	Complete	This initiative was completed as the project was launched in FY18 and lessons were developed based on the feedback from focus groups that met in Q3. In October, YBPP will begin a pilot of the lessons.	
National Institute of Justice Project	In FY18, the Mayor's Youth Bullying Prevention Task Force, via Certification and Advisory Board (CAB), will continue to work to evaluate schools in the National Institute of Justice pilot designed to address school climate and youth bullying prevention. The process entails schools conducting climate surveys, and based on survey results, proposing evidence based framework that supports youth bullying prevention programs. If the proposal is selected, the school will receive funding from the National Institute of Justice to implement the proposed program. The CAB will	75-99%	Collection of school climate data has begun for schools in the pilot. No schools have submitted workbooks to the CAB but we expect between 1-3 workbooks by the end of the year. The CAB continues to look at evidence based local supports to address school climate.	This is an on-going 4 year initiative.



Title	Description	Complete to Date	Status Update	Explanation
	also collect and vet local resources and supports that school, DC agencies and local non-profits can access to support training and programming around violence prevention and safety.			
Program Oversight	In FY18, the Mayor's Youth Bullying Prevention Program will launch a new initiative focusing on youth social media activities and develop an evidence based strategies for teaching kids on how to be safe when accessing social media.	Complete	This initiative was completed as the project was launched in FY18 and lessons were developed based on the feedback from focus groups that met in Q3. In October, YBPP will begin a pilot of the lessons.	
<b>HUMAN RIGHTS COMMISSION (2 Strategic initiatives)</b>				
Electronic Case Management System	In FY18, COHR will implement and use the electronic case management system which was developed in FY17.	75-99%	In Quarter 4, the new case management system was delivered to the Commission. The training and roll out of the system will take place in Quarter 1 of FY 19.	Rollout and training was delayed due to staff transition.
Internal case tracking system	In FY18, COHR will utilize a newly developed internal case tracking system to ensure consistent timely determination of motions and resolution of cases.	Complete	The Commission began use of the new tracking report and is encountering no issues thus far.	
<b>INTAKE (1 Strategic Initiative)</b>				
Intake Case Management	To better manage the flow of increased volume of intakes and individual customer inquiries, in FY18, OHR will separate the intake team from Investigation Unit and create a new Intake Unit to be managed by an Intake Manager who will ensure consistent timely processing of new cases and improve processing systems, including centralization of digitized case file documents.	Complete	OHR has completed this initiative by separating the Intake unit and establishing a centralization of digitized case documents.	
<b>INVESTIGATIONS (1 Strategic Initiative)</b>				
Restructure Investigation Unit	In FY18, OHR will restructure its investigation unit to fine tune case processing efficiency. This effort will include setting up teams within the unit to increase production and exploring conducting "fact finding conferences" to resolve certain cases.	Complete	OHR has restructured the investigation unit by organizing investigators into teams with senior lead investigators leading the team. This has proven successful and useful thus far. OHR has also developed rules for implementing fact finding conference in FY19.	
<b>LANGUAGE ACCESS OVERSIGHT (4 Strategic initiatives)</b>				
Enforcement	As part of OHR's ongoing effort to increase enforcement, in FY18 OHR will establish a LA specific case processing procedure for investigation.	Complete	The Language Access Program is piloting a new investigation process for Language Access complaints and the process has been put in place. Lessons from this pilot will inform the	

Title	Description	Complete to Date	Status Update	Explanation
			development of a new investigation structure for Language Access cases, if necessary.	
Technical Assistance	In FY18, OHR will continue to provide targeted technical assistance and support to newly-appointed Language Access Point of Contacts and covered entities, and continue assisting agencies in recruiting bilingual staff.	Complete	In Q4, LA Program delivered 9 language access compliance training sessions to a total of 4 agencies; held one-on-one meetings with 20 agencies to develop and finalize each agency's FY19/20 biennial language access implementation plan (BLAP); hosted an annual orientation for Language Access Points of Contact; and convened Language Access Coordinators for a bi-monthly technical assistance session for covered entities with major public contact.	
Community Engagement	In FY18, OHR will continue to train Human Rights Liaisons from organizations providing direct services to the Limited English Proficiency and No English Proficiency (LEP/NEP) populations to identify and report language access violations their customers encounter; OHR will continue to partner with Mayor's Offices on African, Asian Pacific Islander, and Latino Affairs as well as the DC Language Access Coalition to conduct "Know Your Rights" trainings to diverse LEP/NEP populations	Complete	OHR held two HRL Workshops in FY18. OHR plans to extend the program into FY19. Additionally, OHR initiated a pilot series that engages local churches with LEP/NEP congregations in efforts to share information in multiple languages about OHR's services. HR kicked off this series with two tabling sessions at Sacred Heart Church in Mt. Pleasant (Spanish-speaking congregation) and plans to expand it's outreach to other communities in FY19. OHR will continue to coordinate with Mayor's Offices on African, Asian Pacific Islander, and Latino Affairs and other community-based groups to help with language support at these outreach events as well as on it's strategy to diversify it's outreach approach when trying to access the LEP/NEP population.	
Compliance Monitoring	In FY18, OHR will track and report on non-compliant agencies and agencies against whom Language Access complaints have been filed via the Mayor's dashboard. Additionally, OHR will update its Language Access Compliance Database to capture more compliance details and electronically track corrective actions.	Complete	In Q4, the LA Program met with two agencies found in non-compliance and developed corrective actions to address compliance gaps. LA Program also followed up with two agencies on their progress with implementation of corrective actions.	
<b>LEGAL SERVICES (2 Strategic initiatives)</b>				
OHR Guidance	To assist the public with compliance, in FY18, OHR will publish four (4) guidance documents in FY18 with each focusing on specific areas of the law. OHR will also update its internal legal templates to ensure	Complete	OHR published enforcement guidance on DCFMLA, National Origin and Race, and greater insights into the Protecting Pregnant Workers Act. Additionally, OHR published a guidance on Mayor's Order 2017-313 on	

Title	Description	Complete to Date	Status Update	Explanation
	consistent legal comprehension within all units.		the District's Sexual Harassment Policy and Procedures.	
FOIA Response	In FY18, OHR will improve its file retrieval mechanism to improve FOIA response time.	Complete	OHR has created a digitized document filing system to assist with expediting response time to FOIA requests.	
<b>MEDIATION (1 Strategic Initiative)</b>				
Mediation Scheduling Oversight	In FY18, OHR will increase unit oversight to improve scheduling control and to ensure all mediation activities occur in a timely manner in accordance with OHR Standard Operating Procedures for Case Processing.	Complete	OHR has completed this initiative by deploying improved systems for scheduling mediation and worked to ensure all SOP timelines are met. In addition to the initiative, OHR is continuing to revise mediation templates.	
<b>PUBLIC EDUCATION (3 Strategic initiatives)</b>				
Education and Training	In FY18, OHR will continue to provide trainings for businesses; work with DLSBD & DCRA to ensure businesses have access to information on the laws OHR enforces; OHR will continue to recruit and train direct service providers from various communities to become HRLs; Develop referral list of training providers.	Complete	In Q4, OHR completed it's Business Training series with DCRA with two sessions to close out the fiscal period. This training series focused on the Fair Criminal Record Screening for Housing Act as well as the Fair Credit Amendment Act. OHR looks to continue this series with DCRA in FY19. OHR also held it's first workshop with the Latino Economic Development Center (LEDC) on civil rights requirements and inclusive practices. The workshop was well-attended with more than 40 business owners participating.	
Expand Outreach	In FY18, OHR will conduct outreach regarding new laws OHR is enforcing including the Fair Credit and Fair Criminal; OHR will continue to attend BID (Business Improvement District) meetings in order to provide information on new laws to the business community.	Complete	In Q4, OHR expanded it's outreach to East of the River communities, with budding partnerships with the family collaboratives in SE. Additionally, OHR continued its partnership with DOES Project Empowerment to provide bi-monthly training and materials to participants of the program. Over the course of the fiscal year, OHR reached over 200 program participants and shared employment rights related information including presentations on their rights under the Fair Criminal Record Screening Amendment Act and Fair Credit Amendment Act.	
		75-99%		

Title	Description	Complete to Date	Status Update	Explanation
Agency Publications	In FY18, OHR will issue at least four (4) publications and explore conducting a second resume testing project.		In Q4, OHR issued it's FY17 Annual Report, highlight case data and prominent initiatives and achievements from the previous fiscal period. OHR has not been able to publish the anticipate Ban the Box Report, but expects to do so in Q1 of FY19.	OHR issued 3 publications: (1) Language Access Report; (2) Annual Report; and (3) OHR Newsletter (new for FY18). OHR has not published the fourth publication (Ban the Box Report) but expects to do in in Q1 of FY19.
<b>RESEARCH AND COMPLIANCE (1 Strategic Initiative)</b>				
EEO Train the Trainer	In FY18, to expand the reach of OHR's EEO trainings, OHR will add a new Train-the-Trainer workshop to the EEO Training Program which will allow agencies to designate OHR certified EEO Trainers to train all agency employees after successfully completing OHR's Train-the-Trainer workshop. OHR will continue to provide the general 3-day EEO certification training and hold quarterly meetings for EEO Counselors and Officers.	75-99%	OHR completed its normal EEO trainings, but was not able to hold a Train the Trainer (T3) session in Q4 due to staff transition.	OHR was not able to hold a Train the Trainer session in Q4 due to staff transition.