



Who made the grade? 2014 Federal Plain Language Report Card

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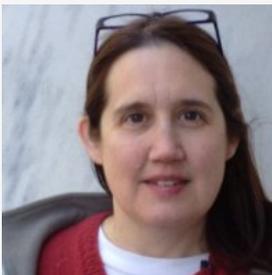
***See also: Building a Plain Language Culture in the US Government
<http://centerforplainlanguage.org/building-a-plain-language-culture-in-the-us-government/>***

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About the author



Kath Straub, Ph.D., conducts research that helps clients understand their customers better, communicate with them more effectively and create more intuitive on-line interactions. Her user-experience consultancy, Usability.org, is a certified woman-owned business that provides customer research, interaction design, and training in user-experience and plain language to state and national government agencies and private organizations around the world. Kath is on the board of the Center for Plain Language, where she is also the Federal Plain Language Report Card project lead.

Federal Plain Language Report Card - 2014

Prepared by the Center for Plain Language

Department	Compliance	Writing	Information Design
Consumer Financial Protection Bureau	A	A	C
Department of Agriculture	A	B	C
Department of Commerce	A	C	C
Department of Defense	A	C	C
Department of Education	D	C	B
Department of Energy	A	B	B
Department of Health and Human Services	A	A	C
Department of Homeland Security	A	A	B
Department of Housing and Urban Development	A	B	C
Department of the Interior	F	I	I
Department of Justice	A	A	C

Department	Compliance	Writing	Information Design
Department of Labor	A	B	C
Department of State	F	I	I
Department of Transportation	A	B	C
Department of the Treasury	A	B	C
Department of Veterans Affairs	A	A	C
Environmental Protection Agency	A	B	C
Government Services Administration	A	A	C
NASA	A	C	C
Securities and Exchange Commission	A	A	B
Small Business Administration	A	B	C
Social Security Administration	A	A	B

Susan Kleiman

27 Jan 2015

Chair, Center for Plain Language

Date

A - Excellent B - Good C - Satisfactory D - Needs Improvement F - Fail I - Failed to submit requested information

Highlights – 2014 Federal Plain Language Report Card

US government writing is improving.

- 16 out of 22 departments improved over last year's grades.
- In 2014, compliance with the Plain Writing Act increased. 19 departments fulfilled the requirements of the Plain Writing Act, earning A's for Compliance, compared with only 12 in 2013. Only 3 Departments—Education, Interior, and State—failed to fulfill the requirements of the Act.
- Many agencies also improved their Writing and Information Design scores, demonstrating commitment to the spirit of the Act, as well.

Three agencies shared top honors in 2014: Homeland Security, Social Security Administration, and Securities and Exchange Commission

- Homeland Security shot from 'detention' to the 'Dean's list,' with the highest writing score in 2014 overall.
- Social Security Administration, last year's leader, remained at the top, demonstrating continued excellence and sustained commitment to communicating clearly.
- The Securities and Exchange Commission, one of the first departments to embrace Plain Writing, returns to a leadership role.

The Departments of the Interior and State land at the bottom.

Both the Departments of the Interior and State failed Compliance in 2014, and since neither submitted writing samples, they got Incompletes in writing. They are at the bottom of the class.

The Department of Education has work to do.

The Department of Education was evaluated for the first time in 2014. They earned passing grades for Writing and Information Design, but a "D" in Compliance, leaving them with catch-up work to do.

Other notable improvements

Departments have started comprehension testing their documents before publication. Readers don't always understand copy the way that writers intend, so comprehension testing provides an important reality check.

The 2014 Plain Language Report Card

Each year, the Center for Plain Language evaluates how effectively federal departments comply with the letter and spirit of the Plain Writing Act of 2010.

We graded each department on:

- **Compliance** – Does the Department fulfill the requirements of the Plain Writing Act of 2010?
- **Writing** – Do writing samples consistently demonstrate plain writing principles (for example, grammar, style, and tone) to make documents easier to read and understand?
- **Information Design** – Do writing samples consistently use information design techniques (including, typography, layout, color, white space, and graphics) to guide readers' attention and reinforce key messages?

What is the Plain Writing Act?

The Plain Writing Act of 2010 encourages agencies to use plain language—language that people can understand and use—for public documents that:

- explain government benefits or services
- offer guidance for getting Federal government benefits or services or filing taxes
- explain how to comply with requirements the government oversees.

To comply with the letter of the Act, agencies must

- appoint one or more senior officials to oversee implementation of the Act
- establish a plain language program
- set up a public feedback mechanism
- train employees on how to write in plain language
- publish an implementation plan and progress updates on a publicly visible website, accessible from the agency's homepage.

If there is an Act, why do we need a report card?

The Plain Writing Act doesn't include a mechanism to review or enforce compliance. So the Center for Plain Language developed a process to evaluate and report compliance efforts each year.

Public review works!

With the help of the press, the Report Card has focused attention and energy on the plain language problem. Agency grades have improved each year since the Report Card started. In 2014, nearly every agency is in compliance with the Act. As a result, they are training staff to write better and producing documents and websites that are easier to read and understand.

How were agencies graded?

The Center worked with Usability.org to design and implement the Report Card analysis. Each department reported about their Plain Language program by completing an on-line survey. They were asked to

- report information showing compliance with the specific requirements of the Plain Writing Act (for instance, the URL for their Plain Writing website)
- identify documents or webpages that could be analyzed for writing and information design
- describe comprehension testing conducted on their samples
- describe challenges and wins within their plain language programs.

Center board members presented a workshop at a [Federal PLAIN working group meeting](#) to help Departments understand the requirements and prepare their materials.

Not every department participated

Although they were invited, two departments, Interior and State, did not provide information on their plain language program or writing samples for analysis. We scored them on Compliance by searching on the web for their program information.

Overall scores

Almost every department improved their plain language grades in 2014.

Trends: Overall plain language grades 2013 to 2014

Change

↑	Consumer Financial Protection Bureau
↓	Department of Agriculture
↑	Department of Commerce
↑	Department of Defense
	Department of Education
↑	Department of Energy
↑	Department of Health and Human Services
↑	Department of Homeland Security
↑	Department of Housing and Urban Development
	Department of the Interior
↑	Department of Justice
↑	Department of Labor
	Department of State
↔	Department of Transportation
↑	Department of the Treasury
↑	Department of Veterans Affairs
↑	Environmental Protection Agency
↑	General Services Administration
↑	NASA
	Securities and Exchange Commission
↑	Small Business Administration
↓	Social Security Administration

Compliance with the Plain Writing Act

The Compliance grade evaluates whether a department fulfills the requirements of the Plain Writing Act. We graded 22 departments on Compliance. First, we assigned points to each requirement in the Act. Some elements, such as the training program and easy-to-use feedback channels, were weighted more

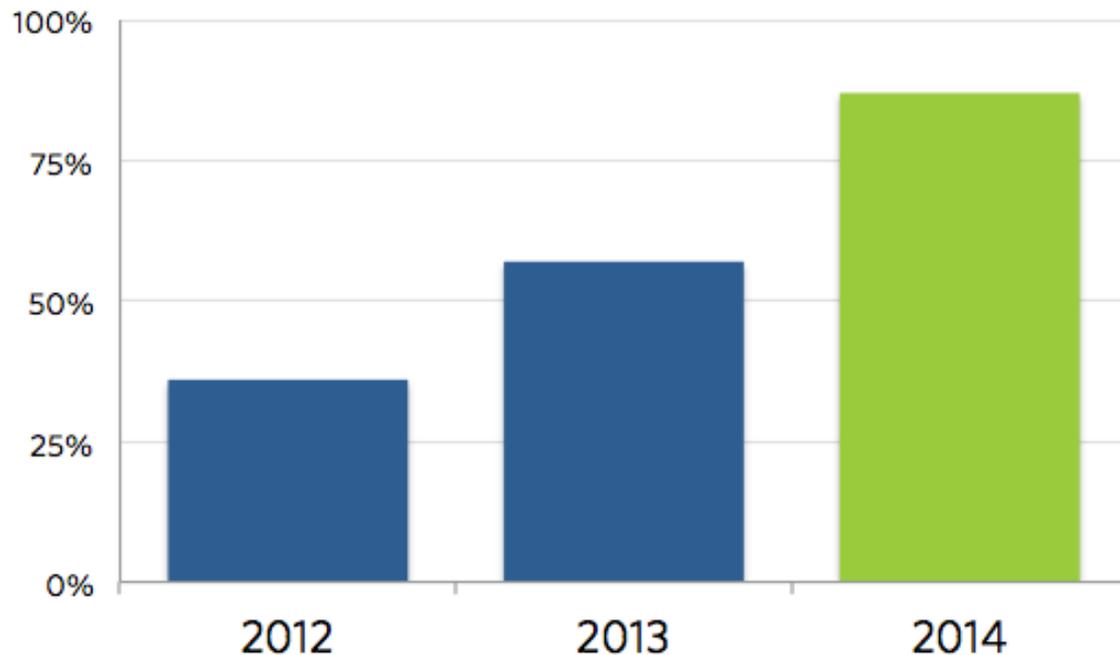
heavily than others. Then we used the self-reported information, with Google searches to confirm (or determine) if a department fulfilled each requirement. Compliance grades reflect the percentage of requirements a department fulfilled.

Compliance results

Compliance increased in 2014, with 19 of the 22 departments earning A's for Compliance. 8 departments catapulted from failing grades in 2013 to A's in 2014. They include:

- Department of Energy
- Department of Homeland Security
- Department of Housing and Urban Development
- Department of Justice
- Department of the Treasury
- Environmental Protection Agency
- NASA
- Securities and Exchange Commission

Percentage of departments that fulfill the requirements of the Plain Writing Act



Only 3 departments earned failing grades on Compliance in 2014: Education (D), Interior (F) and State (F).

Opportunities to improve

The nature of the grading meant that most departments got A's, but there is still room to improve. For instance, most departments publish the name and contact for their Senior Official, and a way for people to provide feedback. However, this information can be difficult to find. (We've [collected the program information and posted it](#) on the Center for Plain Language website.)

Departments can also improve by expanding and tailoring their plain language training to employee needs. Awareness training for people who sign off on communications but may not craft them directly can improve communications, as well. Advanced training, such as information design or hands-on refresher workshops, help even good writers improve. Finally, while public communication is the focus of the Act, clear internal communication is equally critical. Agency-wide training will improve communication overall.

Good training programs improve and evolve constantly. Health and Human Services, Veterans Affairs, Social Security, Treasury, and NASA offer models of excellence in plain language training.

Writing

Each department submitted between 3 and 10 writing samples for evaluation. Some departments also submitted “before” versions of their writing samples so that we could evaluate improvement based on re-writing. If a department provided more than 3 writing samples, we calculated their grade using their 3 best-scoring documents.

We used Acrolinx to analyze writing samples. Acrolinx is a multi-language, linguistic analysis tool that analyzes writing samples against pre-determined standards for spelling, grammar, terminology, style, and tone of voice. It automates the process of evaluating and basic editing. Using Acrolinx ensured that our evaluations used the same rules and the same rigor across all 130+ samples.

Before the analysis, we tuned the Acrolinx rules to the U.S. Government’s Plain Writing Guidelines. Each document was evaluated for spelling, grammar, style, and terminology.

Writing results

Departments’ writing scores also improved in 2014. While improvement is not entirely surprising (departments picked the documents they submitted for analysis), it is still worth noting. At the least, the improvement shows that the plain writing coordinators are getting better at selecting good samples. At best, it indicates that documents are being written (or re-written) using language, structure, and tone that is easier to understand and use.

Our analysis of before-and-after samples also supports the “Government writing is getting better” interpretation. The “after” writing samples we analyzed are more readable than the “before” versions of the same documents, with notable improvements in style and grammar.

Opportunities to improve

Most of the departments and agencies selected good documents for analysis. However, even these carefully selected documents show room for improvement.

In our analysis, spelling and grammatical errors made up approximately 18% of the problems that Acrolinx flagged. Grammatical flags consisted mostly of

- subject/verb agreement errors
- incorrect verb forms
- number agreement mismatches
- word confusions (such as affect/effect, amount/number, fewer/less, to/too, or a/an substitutions)

The remaining flags identified stylistic choices that, based on linguistic research, make reading harder. Some examples include using

- complex or long words
- would, could, should or other auxiliary verbs (also called modal verbs)
- noun clusters
- needless words
- passive verbs
- hidden verbs
- narrative lists rather than bulleted ones

Examples of difficult writing are included in [Appendix B](#).

The number of flags was small relative to the volume of copy we analyzed. However, addressing them would make these documents easier to read. It could also make the tone of writing more consistent across government documents.

Information Design

To determine the Information Design grades, 2 people independently scored the top three documents from each agency on their use of:

- **Typography**—Does the designer use variations in typography (such as bold or increased size) to help readers organize and understand the content?
- **White space**—Does the designer use white space to separate and highlight content, guiding the reader’s attention to and through the document?
- **Color**—Does the designer use color to guide the reader’s attention to important information?
- **Icons**—If the document uses icons, are the images easy to understand and remember?

- **Pictures and graphics**—Does the designer choose pictures or graphics that reinforce and extend the written content? Or were pictures included only to add “visual interest?” Would (more) images or graphics make the content easier to understand?
- **Charts and graphs**-- Does the designer use charts or graphs that effectively reinforce and extend the written content? Would (more) charts and graphs make the content easier to understand?

Raters scored used a scale of 1 (rarely uses this design strategy) to 3 (consistently and effectively applies this design strategy) to rate each sample on each information design element. They could also assign “not applicable.” The averaged scores were used to determine the information design grades.

Information Design Results

Departments submitted examples of good information design, but did not consistently use information design techniques to improve their documents. None of the departments earned an A, even for their top 3 documents.

Opportunities to improve

Information design offers the biggest area for improving government writing, based on the documents we reviewed. Departments can improve by using typographic strategies and color to grab and guide readers’ attention to important information and through the document. Many of the documents we reviewed could also be improved by including carefully selected graphics or charts to reinforce, explain, or even extend the written message.

Testing plain language

This year, we also asked the plain writing coordinators to describe any comprehension testing they conducted to validate that target readers could understand and use their writing samples. Several departments described testing comprehension efforts.

Social Security, HUD and several other departments reported that they evaluate comprehension by observing and interviewing readers while they read and use plain language content. Other departments, such as VA, used remote methods,

including comprehension surveys, to evaluate the documents they submitted. Still others described evaluated success by statistically contrasting peoples' likelihood to respond appropriately before and after communications were written in plain language.

All these methods have the same goal: Establish whether (or not) the target readers can understand, remember, and act on critical instructions or message.

Several departments, such as the Consumer Financial Protection Bureau, Commerce, Housing and Urban Development, Veterans Administration, and Social Security described interview-based testing programs. Some of these programs include both formative and summative research. Formative research documents the target audience's knowledge and needs. It informs and shapes content design before or while the content is being designed. Summative testing validates final copy to establish that readers understand and can use a document or website the way that writer and designers intended.

While some departments described robust comprehension methods, others confused comprehension testing with studies that speak to design goals other than comprehension. Those included:

- 508 compliance testing – 508 testing shows whether documents or websites are universally accessible, or fulfill the requirements of Section 508.
- Peer or expert reviews – Peers typically also have significant domain knowledge, even if they are not domain experts. They can give valuable feedback on grammar, style, and technical accuracy. However, they cannot typically provide insights about how target readers experience or try to use information and interactions.
- Web analytics – Web analytics describe where users land, look and linger on a website. We can use web analytics to learn that people spend a long time on a specific page. But analytics don't tell us if they did that because they were highly engaged, mystified, or they fell asleep.
- Focus groups – Focus groups are a powerful technique for brainstorming and innovating possible solutions. They also allow content teams to explore knowledge and past behaviors of audience members. However, group discussions (and group dynamics) do not lend themselves to reliably discovering how individuals will understand and interact with content.

Good comprehension testing uses systematic, scientific methods to evaluate whether readers understand and use content to act confidently. It explores how readers interpret content, including their beliefs (including myths, misconceptions, and misunderstandings) about the content, and their barriers to using what they read to take action.

Opportunities to improve

For departments that don't comprehension test their documents yet, recognizing the value and benefit of testing is the first step. The next step is to include research methods, test design and moderation skills in plain language training programs.

Summary

This year's Report Card results show that U.S. Government agencies can communicate clearly. Nearly every agency fulfills the requirements of the Plain Writing Act of 2010. Further, the writing and information design grades demonstrate a commitment to the spirit in addition to the letter of the law. This improvement demonstrates the keen commitment on the part of senior leadership and the significant effort of the government staff.

This year's Report Card also shows that public attention and scrutiny can influence change in government. The Report Card fills the review and enforcement gap in the Plain Writing Act by drawing attention to compliance and the progress being made (or not) by individual agencies.

Next steps

We have seen significant improvements this year, but the effort is on-going.

A few departments still need to come into compliance with the Act. Others can continue to improve by

- recognizing and rewarding clear communications
- extending training to include all employees and all communication types
- expanding training programs to include advanced techniques, document testing methods, and best practices tailored to specific topics or audience groups
- integrating document testing into the evaluation plan.

In the future, the Center for Plain Language will select representative documents, websites and communications to evaluate, rather than inviting departments to select and submit samples.

Congressman Loeb sack (D, IA), who worked with us to publicize the results, will send each department and agency will get a letter recognizing their efforts. Departments earning passing grades will receive a letter of recognition or commendation. Failing departments will receive a letter encouraging them to do better.

Quotes about the 2014 Report Card results

"In an age where information is at our fingertips and easily accessible, we must adapt and simplify our federal government to keep up with the needs of the American public. Throughout my time in Congress, I have been a strong supporter of efforts to improve transparency, which is why I'm proud to be a voice in ensuring that federal agencies are communicating in plain language."
Congressman Dave Loebsack (D-Iowa)

"Four years after the signing of the Plain Writing Act, most government agencies are following the letter of the law and communicating better with the American public. We are delighted to have been a part of that change."
Susan Kleimann, PhD
Center for Plain Language Board Chair.

"The public review process works. With the help of the press, we have nudged departments to demonstrate their commitment to plain language. In 2014, nearly every agency is now in compliance with the Act. More importantly, the grades show that agencies are embracing both the letter and the spirit of the Plain Writing Act."

Kath Straub, PhD
Center for Plain Language
Board Member and
Report Card Analysis Lead

"Under the leadership of Secretary Johnson and Deputy Secretary Mayorkas, the Department of Homeland Security is committed to making communication clear and user-friendly, whether it is directed to employees, our stakeholders, or the public. We are proud to earn A's. It is a testament to the hard work of our employees across DHS. Many thanks to the Center for Plain Language for this esteemed recognition. I am so proud to represent the Department on this amazing achievement."

Kim O'Connor
Executive Secretary
Homeland Security

"Social Security is proud to be recognized as a leader in using plain language. The grades reflect our strong commitment to clear communication at all levels of the agency. Promoting clear, concise, and well organized writing helps us to effectively communicate with the public and to operate more efficiently."

Carolyn W. Colvin
Acting Commissioner
Social Security Administration

The Plain Language Action and Information Network (PLAIN) sees the Center for Plain Language's annual report card as a great motivator to Federal departments and agencies. The grades show an increasing investment in using and teaching plain language requirements."

Kathryn Catania and Katherine Spivey
Co-Chairs, Plain Language Action and Information Network (PLAIN)

Appendix A

[Link to table of department and agency plain language websites, feedback emails, and senior officials](#)

Appendix B: Examples of difficult writing

Long sentences

What's the problem? Long sentences get long when they contain extra words or more than one idea. Trim the extra words first. Try to write one sentence per idea.

Examples

Original: Our close partnerships with State partners and the electricity industry to provide knowledge, resources, and support in developing effective risk-based approaches which help identify impacts in advance of events will continue to play a crucial role in helping to ensure that the nation is ready for the challenges of today's dynamic environment. (52 words)

More readable: Risk-based approaches, developed with State and the Electric industry partners, determine the impact of events before they occur. They help our nation prepare for the challenges of today's dynamic environment.

Original: Named after two former U.S. senators, Sherman Minton and Homer Earl Capehart, the eight-story Minton-Capehart Federal Building is located in the central business district of Indianapolis across from Memorial Park and within blocks of the Birch Bayh Federal Building and U.S. Courthouse. (44 words)

More readable: The eight-story Minton-Capehart Federal Building is located near Memorial Park and the Birch Bayh Federal Building and U.S. Courthouse. It is named after former U.S. Senators Sherman Minton and Homer Earl Capehart.

Original: Daylight harvesting, the use of natural light to offset electric light in perimeter workspaces, offers the opportunity to reduce lighting energy by between 20% and 60%, assuming that daylight harvesting is only one component of an integrated lighting control system. (40 words)

More readable: Daylight harvesting replaces electric light with natural light in perimeter workspaces. When combined with other lighting control strategies, daylight harvesting can reduce lighting energy by between 20% and 60%.

Original: Because of widespread interest in both of these recalls, however, FSIS has decided to temporarily leave the recall releases and distribution lists in the "active" section of the recalls website, rather than moving it to the "archive" section, as is usual policy, in an effort to continue to make the information as accessible as possible. (55 words)

More readable: Due to widespread interest and a continued need for information, the Rancho Feeding Corporation recalls and distribution lists will remain on the active the recall list.

Original: The WEX program includes professional development for teachers in the form of workshops and coaching, as well as leadership training and coaching for school administrators to help them monitor and support implementation of the program. (35 words)

More readable: The WEX program offers professional development workshops and coaching for teachers. School administrators receive leadership training and coaching that helps them implement and monitor the program.

Incorrect subject/verb agreement

What's the problem? Spelling and Grammatical errors make a source less credible.

Food made by hand that require no cooking; e.g., puddings, sandwiches...

Belligerent behavior, inappropriate jokes and threats is not tolerated.

The Marketplace and the Safety Net has what you need to know about the health insurance Marketplace, ...

Passive verbs

What's the problem? When you switch from active voice to passive voice, the standard order of who did what to whom is also switched reversed. This makes understanding these sentences harder to read. Reading passive sentences takes longer than reading active ones.

Original: The date has been determined by the manufacturer of the product.

More readable: The manufacturer determined the date of the product.

Original: Heat exhaustion is caused by the loss of large amounts of fluid and electrolytes.

More readable: Loosing large amounts of fluids and electrolytes causes heat exhaustion. Or Heat exhaustion occurs when people loose large amounts of fluids and electrolytes.

Original: This is because the electrical standards were originally established by the individual countries and at the time, there was no international standardization.

More readable: There was no international standardization originally. Each country set its own electrical standards.

Original: The JavaScript used on this site for creative design effects is not supported by your browser.

More readable: This site uses JavaScript for creative design effects. Your browser does not support JavaScript.

Hidden verbs

What's the problem? Hidden verbs happen when people create nouns from verbs. These forms typically include more words, and are harder to read and interpret. Using the simple (original) verb form is a better approach. (Linguists joke about "verbing nouns" "nouncing verbs")

- conduct an investigation (How about "investigate"?)
 - take into consideration (or just "consider")
 - take a look (How about just "look"?)
 - make adjustment (or just "adjust")
 - take action (or "act")
-

Complex or long words

What's the problem? People like to coin new words, but the old ones are typically shorter and easier to understand.

- Gasification
 - Grantsmanship
 - Weatherization
-

Modal verbs

What's the problem? Modals verbs or auxiliary verbs, like might, may, shall, should typically indicate requirements or possibilities in the future. There are contexts, like scientific claims, where writers need to allow for the possible (for example, "Ebola may not be airborne"). That type of hedge is typically not necessary in most government writing, so modals are typically just extra words. Unless you need to hedge, don't.

Original: To locate wells that **may** have been missed by the aerial magnetic survey, the investigators studied publically available surface-elevation data and combed through historic aerial photographs.

More readable: Investigators studied publicly available surface-elevation data and historic photos to find wells the aerial magnetic survey missed.

Original: Food safety is extremely important and **should** be practiced with every meal you eat or prepare.

More readable: Food safety is extremely important. Practice it with every meal you eat or prepare.

Noun clusters

What's the problem? Remembering, and then unpacking and interpreting long strings of nouns takes extra mental effort.

- National Electric Transmission Congestion Study
 - Recovery Act Interconnection Transmission Planning
 - Electricity Policy Technical Assistance Program
 - User menu global search
-

Needless words

What's the problem? Extra words mean extra work for readers.

- This kind of behavior (How about "this behavior"?)
- particularly important
- very powerful
- actually comprised
- completely unprotected
- generally accepted