Center for Plain Language

2015 Federal Plain Language Report Card

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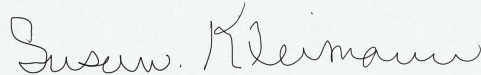*Center for Plain Language, Board Member & Federal Plain Language Report Card*
Lead
President, CPoint Consulting

Federal Plain Language Report Card - 2015

Prepared by the Center for Plain Language

Department	Compliance	Writing & Information Design
Consumer Financial Protection Bureau	A	A
Department of Agriculture	A+	A–
Department of Commerce	A	B–
Department of Defense	A	C+
Department of Education	A–	A–
Department of Energy	A	B+
Department of Health and Human Services	A	B
Department of Homeland Security	A+	A
Department of Housing and Urban Development	C	A
Department of Justice	A	B
Department of Labor	B+	A

Department	Compliance	Writing & Information Design
Department of State	C–	C
Department of the Interior	A	A–
Department of the Treasury	A–	A–
Department of Transportation	C–	B–
Department of Veterans Affairs	A+	B+
Environmental Protection Agency	C	A
General Services Administration	A–	B
National Aeronautics and Space Administration	A–	B+
National Archives and Records Administration	A+	B
Securities and Exchange Commission	A–	B
Small Business Administration	A+	B+
Social Security Administration	A+	A

Susan Kleimann

Chair, Center for Plain Language

17 Nov 2015

Date

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

Executive Summary

To encourage agencies to promote and produce plain writing in keeping with The Plain Writing Act of 2010, the Center for Plain Language reviewed their plain language programs and some writing samples. We have assigned a Compliance grade and a Writing & Information Design grade to all participating agencies. Readers scored writing samples against a set of plain language criteria, and we analyzed the samples with an electronic text analysis tool, Acrolinx, for grammar, style, and overall readability. The results revealed general improvement, but a few grades went down. Agencies are making progress in using plain language, but much writing still uses a bureaucratic, overly technical style with an un-reader-friendly structure. User testing was rare among agencies.

Compared to last year…

- Participation by agencies in the Center for Plain Language Federal Plain Language Report Card reached an all-time high: 23 agencies submitted materials for review, including all 15 Cabinet-level departments.

- Compliance scores increased overall: Eight agencies improved while four others dropped. All 23 agencies fulfilled the requirements of the Act...though some are doing so better than others.

- In Writing & Information Design, 13 agencies improved while the grades of only five dropped.[1]

- We saw no Ds or Fs in either Compliance or Writing & Information Design, and overall, a record number of agencies scored B or higher.

This year's most exceptional agency: Social Security Administration (SSA)

SSA earned the highest combination of reader and Acrolinx marks, leading to an A+ for Compliance and an A for Writing & Information Design. SSA's high readability score, strong user testing process, outstanding compliance, and obvious zeal for plain language shown during the Report Card submission process put the agency at the forefront of this year's review. A close second for the highest grades across both categories, also earning an A+ for Compliance and an A for Writing & Information Design, is the Department of Homeland Security.

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[1] Compared with the category "Writing" last year. We combined last year's Writing and Information Design categories into a single category, Writing & Information Design.

Better or worse than last year?

Overall, most agencies improved or stayed the same. Only a few grades dropped from last year:

AGENCY	Compliance	Writing & Info Design*
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 Justice	✔	↓
Department of Labor	↓	↑
Department of State	↑	↑
Department of the Interior	↑	↑
Department of the Treasury	✔	↑
Department of Transportation	↓	✔
Department of Veterans Affairs	↑	↓
Environmental Protection Agency	↓	↑
General Services Administration	✔	↓
National Aeronautics and Space Administration	✔	↑
National Archives and Records Administration **	↑	↑
Securities and Exchange Commission	✔	↓
Small Business Administration	↑	↑
Social Security Administration	↑	✔

Increases (↑) include those who went from A to A+. Decreases (↓), however, are for a change of letter grade (such as A- to B). ✔ = no change from last year, including agencies who earned, for example, an A last year and an A- this year.

*Compared to the Writing grade in 2014
**Compared to 2012 scores, the last time National Archives participated

Greatest Gains?

Education, Interior, and State jumped from substandard to fully compliant

Near the bottom last year, the Department of Education showed the greatest overall improvement across both categories, moving up from D to A- for Compliance and up from C to A- for Writing & Information Design. The Departments of the Interior and State made great strides in Compliance: State moved from F to C-, and Interior soared from F to A!

State and Defense have work to do

Though satisfactory, the Writing & Information Design Grades for the Departments of State (C) and Defense (C+) suggest they need the most work on their actual documents.

Examples of the best…and worst
Clear writing

From the Department of the Interior's "Who We Are" (About Us) page:

> *Our employees, along with more than 280,000 volunteers, carry out Interior's mission from more than 2,400 operating locations. Serving communities large and small, they deliver our department's land- and community-based programs in ways that engage the participation of citizens, groups and businesses.*
>
> *We at Interior fulfill our commitment to the American people under a $12 billion total annual budget and through the dedication of our employees and other partners. We also raise billions in revenue annually from energy, mineral, grazing, and timber leases, as well as recreational permits and land sales.*

Grader's comments:

"…clear and active writing, packaged in engaging, attractive, and well-designed pages that combine text, video, and visuals (photos and illustrations). Contains minimal jargon or style distractions. This is a memorable 'About Us' page that sets a good standard for many agencies."

From the Consumer Financial Protection Bureau home buying toolkit:

How can this toolkit help you?

Buying a home is exciting and, let's face it, complicated. This booklet is a toolkit that can help you make better choices along your path to owning a home.

After you finish this toolkit:

- You'll know the most important steps you need to take to **get the best mortgage** for your situation .... Section 1: Page 3

- You'll better **understand your closing costs** and what it takes to buy a home .... Section 2: Page 16

- You'll see a few ways to **be a successful homeowner** .... Section 3: Page 24

How to use the toolkit:

The location symbol orients you to where you are in the home buying process.

The pencil tells you it is time to get out your pencil or pen to circle, check, or fill in numbers.

The magnifying glass highlights tips to help you research further to find important information.

The speech bubble shows you conversation starters for talking to others and

Grader's comments:
"…succeeds in meeting high standards of usability. It combines good document design for an instructional document with clear prose, tables, textboxes, easy-to-use forms, with engaging but not distracting colors. It provides a bottom-line-up-front approach (see below), followed by clear guidance throughout. The significant amount of writing in the document uses pronouns, minimal passive voice, short sentences, and plain language with definitions where needed."

Writing needing work

Opening paragraphs of the Department of Defense "About Us" page

On behalf of the Secretary of Defense and Deputy Secretary of Defense, we welcome you to Defense.gov, the official web site for the Department of Defense and the starting point for finding U.S. military information online. The home page for this site is located at http://www.defense.gov/.

The Secretary of Defense is the principal defense policy advisor to the President. Under the direction of the President, the Secretary exercises authority, direction, and control over the Department of Defense. The Deputy Secretary, the second-highest ranking official in the DoD, is delegated full power and authority to act for the Secretary and to exercise the powers of the Secretary on any and all matters for which the Secretary is authorized to act.

Grader's comments:
"This page contains useful information, but the text is heavy with passive voice, redundancies, and unnecessarily complex sentences. It is also weak on visual elements, doing a lot more telling than showing. Structurally, when do we find out what the Department of Defense actually does? That question is what would bring me to this page."

From the Department of State Intercountry Adoption Guide

HAGUE ADOPTION CONVENTION

The Hague Convention on the Protection of Children and Co-operation in Respect of Inter-Country Adoption (Hague Adoption Convention) is an international agreement to safeguard intercountry adoptions. Concluded on May 29, 1993 in The Hague, the Netherlands, the Convention establishes international standards of practices for intercountry adoptions. The United States signed the Convention in 1994, and the Convention entered into force for the United States in April 2008. If you adopt from a country that is party to the Convention (Convention countries), your adoption has additional protections as well as some added requirements.

One of the most important protections is that your adoption agency or service provider must be accredited to conduct intercountry adoptions. The standards for accreditation ensure that your agency is qualified to provide services.

Grader's comments: "This document is visually excellent and well done in many respects. But some of the prose is structurally un-reader friendly. The last

sentence in the first paragraph here should come first, and the style uses more words than necessary, including unhelpful passive voice."

The Grading Process

Each year, the Center for Plain Language evaluates how effectively federal departments comply with the Plain Writing Act of 2010. We graded each department in two categories:

- **Compliance** – Does the department fulfill the requirements of the Plain Writing Act of 2010?
- **Writing & Information Design** – Do writing samples consistently demonstrate plain writing principles (for example, clear style and organization and effective visual elements) to make documents easier to read and understand?

What did we review?

The Center worked with CPoint Consulting to design and implement the Federal Plain Language Report Card analysis. Each agency reported on its Plain Language program using a worksheet that we provided, which they submitted along with the documents to be reviewed. Plain language professionals 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 and training provided in the past year)
- describe their plans for implementing further steps in using plain language in their agency's writing
- submit two specific types of writing samples:
    - ✓ the agency's "About Us" page as linked from its homepage
    - ✓ a public-facing document of their choosing

        The agency was also asked to describe the audience, purpose, and context for this document, as well as any user testing conducted to determine its effectiveness.

Center volunteers read the submissions and scored them against the criteria we use to judge our annual plain language awards (see p. 9). We also used Acrolinx, an electronic text analysis tool, to provide a statistical analysis of grammar and style trends and a "readability" score for each writing sample. For most agencies, these scores were generally consistent with the readers' reviews; however, the

Acrolinx analysis revealed some characteristics that earned extra marks for a few agencies and caused two agencies to drop down half a letter grade.

Chip Crane, Federal Plain Language Report Card Lead, and Annetta Cheek, former Center for Plain Language Chair, briefed agency reps at a Federal PLAIN meeting in June to help departments understand the requirements and prepare their materials. Federal PLAIN is an interagency working group designated to guide agencies in plain writing.

New this year

Human reviewers. This year we asked human readers to judge the writing style, structure, audience, and tone. We wanted actual readers to judge the documents with their intended audiences and situations in mind. We also again used the computerized tool Acrolinx to provide statistical analysis of stylistic weaknesses and readability. Grades rest primarily on the reader scores, but in some cases they rose or fell slightly as a result of the analysis by Acrolinx.

The evaluation system. We scored the submissions against eight criteria:

- Writing Style
- Understanding the Audience
- Manner or Voice
- Structure and Navigation
- Information Design and Presentation
- Pictures, Graphics, and Charts
- Overall effectiveness
- *Testing*—Agencies who had tested the entries with end users and stakeholders earned bonus points

The Center uses these same criteria to judge our annual plain language awards, the ClearMarks—our contest for the best plain writing in private and public sector communications.

A combined Writing & Information Design grade. We assessed both what the words convey and what the visual elements (typography, layout, color, white space, and graphics) achieve. Both are vital to clear communication, and both are part of the judging criteria. Therefore, we have merged the two categories from last year, "Writing" and "Information Design," into one grade that incorporates both: "Writing & Information Design."

Plus and minus grades. As many academic institutions have done with their grading systems in recent years, we used gradations such as A- and B+ this year. This change makes the feedback more precise and indicates more clearly where agencies have room to improve.

Document context. To facilitate the readers' understanding of the documents, we asked agencies to provide a written description of the intended audience, purpose, and context for each submission.

Feedback to agencies. We want to make the Federal Plain Language Report Card project an increasingly helpful service to the government, and to that end, our graders provided specific comments on the submissions which we will pass along to the agencies.

Every Department participated! For the first time, all 15 Cabinet-level agencies submitted materials for review. Eight non-Cabinet agencies also participated.

What is the Plain Writing Act?

The Plain Writing Act of 2010 requires agencies to use language that people can understand and use for public documents that
- explain government benefits or services
- offer guidance for receiving Federal government benefits or services
- explain how to comply with requirements the government oversees.

To comply with 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.

Why is the Center involved?

The Plain Writing Act doesn't include a mechanism to review or enforce compliance. A few years ago, the Center for Plain Language began reviewing agencies' writing as a service and an incentive to help them improve in both administrative compliance and writing.

Acknowledgements

We at the Center thank the following people and organizations for their contributions to the Report Card effort:

About the Author

Dr. Chip Crane is a board member and the Federal Report Card Lead for the Center for Plain Language. Chip is a trainer and consultant in writing and speaking; he also teaches technical writing (and medieval literature) at the University of Maryland at College Park. Prior to his consulting work, he directed the Writing Center at the United States Naval Academy, his alma mater, for several years during his active duty Navy career. Chip considers clear writing a product of clear thinking and sees helping people write—and think—better as part of his life's calling. He is honored to help facilitate clearer communication in the federal government.