2017 Federal Plain Language Report Card

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FEDERAL PLAIN LANGUAGE REPORT CARD 2017

Prepared by the Center for Plain Language

Agency	Writing and Information Design: FAQ	Data Infographic
Consumer Financial Protection Bureau	B	C+
Department of Agriculture	A	A
Department of Commerce	C	D+
Department of Defense	A	B+
Department of Education	A-	B
Department of Energy	C+	A-
Department of Health and Human Services	C+	C+
Department of Homeland Security	B	B+
Department of Housing and Urban Development	D+	C
Department of Justice	C-	C-
Department of Labor	A	B-
Department of State	A-	B
Department of the Interior	C-	A-
Department of the Treasury	D+	C-
Department of Transportation	C	C+
Department of Veterans Affairs	A-	C
General Services Administration	A	B-
National Aeronautics and Space Administration (NASA)	C+	A-
National Archives and Records Administration	B-	C
Small Business Administration	B-	A-
Social Security Administration	A +	B

Susan Kleimann

Chair, Center for Plain Language

October 12, 2017

Date

A: Excellent B: Good C: Satisfactory D: Needs Improvement F: Fail

Executive Summary

This Report Card for the use of plain language in the U.S. Federal Government is the 6th annual review of documents from major agencies in the Executive Branch. The review covered information from a wide range of disciplines, such as health, educational, security, technology, and industry. This year we asked each agency to submit two sample documents for two separate grades: A Frequently Asked Questions (FAQ) page and a data infographic.[1] A FAQ page should represent an agency's best effort to address its most interested public customers who, as the term suggests, have come with questions. The infographic as a separately graded category is new to the report card this year. Including these visual displays of data reflects the Center's interest in all facets of clear communication.

As the data below shows, average grades for the writing and information design grades were lower than last year. Creating a truly excellent FAQ page is more difficult than one might expect, and our graders held the submissions to rigorous standards. The infographic grades had a similar average and range, reflecting the challenge of using the powerful and increasingly powerful medium.

A few highlights…

- The Center graded 21 agencies. For the writing and information design grades, six improved from last year, and 11 dropped. Only one earned the same grade. The remaining three were not graded last year.
- In the grades for writing and information design, the average raw score change from last year was half a letter grade, an overall drop of about 11%.
- The average grade in both categories was a B.
- USDA scored highest overall with an A in both categories while Social Security earned the highest single grade, an A+, for writing and information design on their FAQ.
- Treasury and HUD received the lowest scores for their FAQ pages, a D+, and Commerce earned the only D+ for an infographic.
- Commerce and Health and Human Services dropped by two whole letter grades in writing and information design. Social Security jumped up a whole letter grade.

[1] For cabinet-level agencies that did not submit samples, the Center found examples from their public websites to evaluate.

The Best and Worst

This year's top performers

Congratulations to the U.S. Department of Agriculture with the highest total marks overall, earning an A for *both* its FAQ submission and it infographic—the only agency to earn an A for the latter! For the FAQ page alone, the Social Security Administration earned the highest mark with an A+.

The Departments of Defense and Labor also earned A's for their FAQ pages. For the infographics, four agencies came in just behind USDA with A- grades: Energy, Interior, NASA, and the Small Business Administration.

Greatest need for improvement

For writing and information design in the FAQ pages, Housing and Urban Development (HUD) and Treasury tied for the lowest at D+.

For Infographics, Commerce earned the only unsatisfactory grade, D+, but overall more agencies earned a C+ or lower for these samples.

Greatest gains…and falls:

Social Security's writing and information design grade jumped from a B+ to A+, the only improvement of a whole letter grade. The General Services Administration was a close second for its improvement from a B+ to an A for its FAQ page.

And the greatest drops? Two agencies' writing scores fell by two whole letter grades: Commerce and Health and Human Services. Energy and Treasury fell by a grade and a half.

Trends: How do the grades compare with last year's?

AGENCY	Writing & Info Design Grades Compared to 2016
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	X
Department of Justice	↓
Department of Labor	↓
Department of State	↓
Department of the Interior	↓
Department of the Treasury	↓↓
Department of Transportation	X
Department of Veterans Affairs	↑
General Services Administration	↑
National Aeronautics and Space Administration (NASA)	↓
National Archives and Records Administration	↓
Small Business Administration	X
Social Security Administration	↑

Increases (↑) and decreases (↓) include half-grade changes (e.g., B to B+). Double marks (↓↓) indicate a decrease in more than a whole letter grade. √ *= no change from last year.* ***X*** *= Not graded last year.*

The Documents: What did we review?

Our choice of FAQ pages and infographics—two distinct forms of public communication—reflects the Center's aim of making information of all kinds accessible to the intended readers. Susan Kleimann, Ph.D., Chair of the Center, explains the rationale behind the review of two such different genres: "This mix lets us see how agencies handle the information that consumers ask for on a regular basis—as well as looking at their more creative approach to giving information. We know that FAQs often receive very little attention in terms of design and making sure that the information is clear. Infographics are a wonderful way to help consumers visualize information and see its importance, yet infographics are notoriously hard to do well."

Frequently Asked Questions

A FAQ sheet exemplifies the mission of plain language because the information is inherently targeted toward a less-knowledgeable reader who is actively seeking that information for a specific use. Reading a well-written FAQ page is easy; writing one is not—as the lower writing scores this year testify.

The FAQ page has become so widespread that we take it for granted that any organization, product, or process will offer one. Users quickly look for an FAQ page to orient themselves to the site they visit, perhaps even before they actually develop their own questions. This relatively new genre is popular and powerful because the rhetorical use of questions to identify topics creates for readers a sense of active participation in the shared knowledge.

Data Infographics

Plain language is essentially audience-centered communication. And as our culture grows increasingly visual in communications (for better or worse), making information accessible to the public through graphics as well as words becomes more and more part of plain language. In addition to the emphasis placed here in the report card on effective visuals, the Center's annual workshop in DC last May focused on infographics. Dona Wong, an expert in the practice, provided Center members with practical and insightful advice on choosing and designing a useful visual display of data. Wong identifies three "essential elements" to an effective infographic: rich content, inviting visualization, sophisticated execution.[2] The criteria we used in grading the infographics reflects these priorities along with an assessment of the writing style and tailoring for audience.

[2] Dona M. Wong, *The Wall Street Journal Guide to Information Graphics,* New York: W. W. Norton, 2010, 14.

Grades: How did we arrive at these scores?

The evaluation system

Because the FAQs and infographics are such distinct genres, representing different approaches to making information accessible, we graded them separately. FAQs rely more on words, of course. But both rely heavily on layout and organization. We scored the submissions in both categories against seven criteria:

- Overall Effectiveness
- Understanding the Audience
- Manner or Voice
- Writing Style
- Structure and Navigation
- Information Design and Presentation
- Pictures, Graphics, and Charts (if applicable)

The Center uses these same criteria to judge our annual plain language awards, the ClearMarks—our equivalent of the Academy Awards for the best plain writing in private- and public-sector communications.[3] For this report card, we tailored the descriptions of the criteria for the graders to the respective tasks of reviewing FAQ pages and infographics.

We asked agencies to provide with their submissions a brief description of the audience and purpose of each FAQ and infographic. Graders used this information to assess overall effectiveness and the tailoring of the information and writing style for the intended audience.

As the criteria listed above show, we assessed far more than word choice and sentence structure in the FAQs, and we looked at more than colors and shapes in the infographics. The graders judged both categories what the words conveyed and what the visual elements (typography, layout, color, white space, and graphics) achieved.

Graders assigned a score from 1 – 5 (5 being "excellent") for each criterion. At least two readers scored each submission, and we averaged their scores. If an agency submitted two FAQs or infographics (instead of the one required), we scored both submissions and averaged them. To receive an A, the average of all graders for the submission needed to be 4.5 or greater. Raw scores ranged from 1.93 (Treasury) to 4.78 (Social Security).[4]

Continuing last year's practice, we also added a half-letter grade (e.g., B+ to A-) to the writing and information design grade for agencies that turned in their submissions by the due date and provided particularly thoughtful, thorough descriptions of audience and purpose along with their documents. These plain language officials showed initiative in

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[3] Submissions for this year's ClearMark Awards are due Jan 31. We encourage agencies—especially those earning high marks—to nominate their documents. See the Center's website for details: www.centerforplainlanguage.org

[4] Agency Plain Language officials may Contact Chip Crane for details of scoring and grader's comments. See the end of this report for contact info.

supporting this project and awareness of the way their documents target the public, keeping plain language on the front burner in their agencies.

To help ensure graders were applying the criteria consistently with one another, they completed a norming exercise on some sample documents. We asked them to score the samples and then see how others scored them. This effort to calibrate the reviewers' standards, we believe, increases the rigor and accuracy of the grades and reduces subjectivity.

As a cross-check with readers' scores, we also used an automated tool called Acrolinx to review a sampling of the submissions and compared graders' scores with those results. Acrolinx is a multi-language, linguistic analysis tool that analyzes writing samples against pre-determined standards for spelling, grammar, terminology, and style. Acrolinx has customized its analysis for the Center to the U.S. Government's Plain Writing Guidelines. The tool yields a numerical rating for the frequency of specific "flagged" items like comma errors, passive voice, and technical language and for overall "readability." Although such automated tools cannot replicate the reading context, visual assessment, and other criteria, the Acrolinx scores of the writing style of those samples correlated well with our graders' scores.

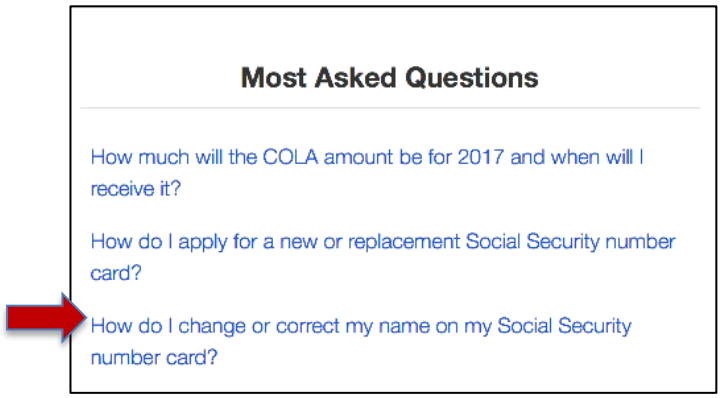
Examples from the Submissions

Want to see for yourself? Below are a few examples of the stronger—and weaker—submissions.

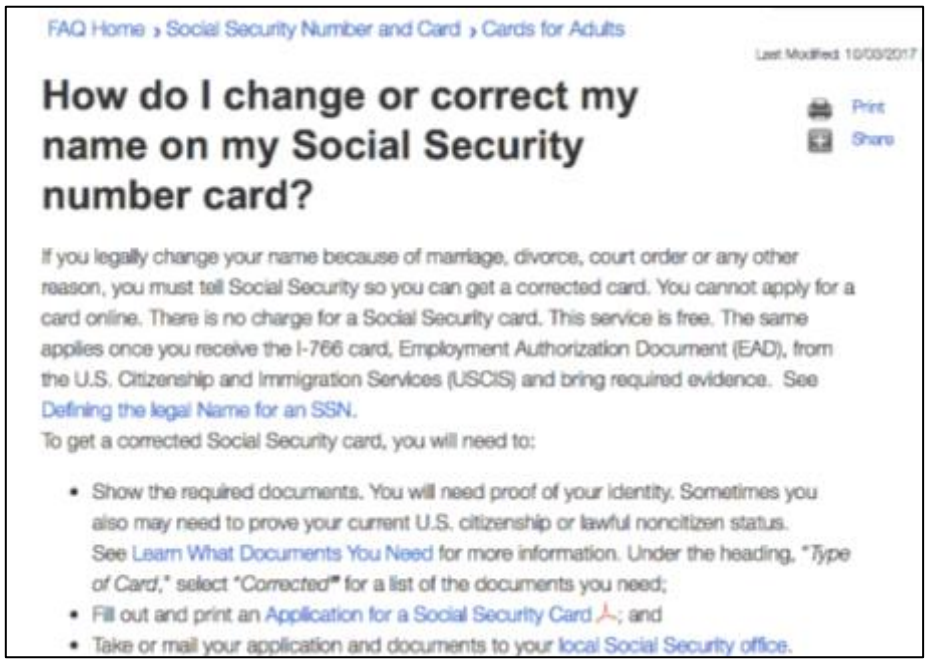
FAQ Examples

We did not score only the wording of the individual sentences; we also graded the visual appeal of the landing page, the arrangement of the questions, the size of the font, and the ease of navigating to the question you want.

From the top-scoring Social Security FAQ:



Source: https://faq.ssa.gov/ics/support/default.asp?deptID=34019&_referrer



Graders' comments on the Social Security FAQ:

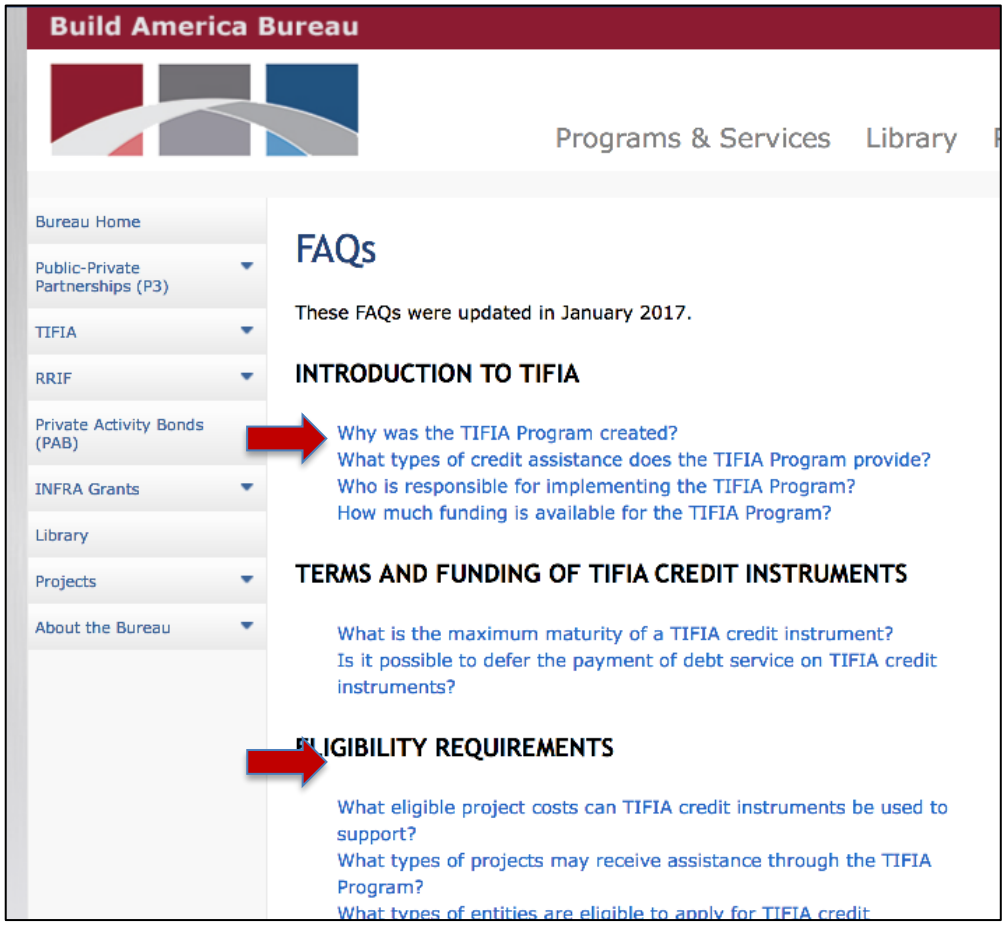
"They masterfully employ PL guidelines (pronouns, lists, informative links, shorter sentences, etc.). Everything is clear and to the point."

"I liked the structure of this item more than any other. The list of most asked FAQs gave me a sense that these were indeed frequently asked questions by the public - rather than, as was clear in some other documents, just questions the agency thought you should ask. The menu of major topic areas on the left was also very helpful."

"…the tone is professional and very informative. Very organized and precise."

"Excellent work! I am impressed. They have considered a lot of factors when organizing this page. The page addresses its users really well."

A less-helpful example from Department of Transportation's (DOT) FAQ



Source: https://www.transportation.gov/buildamerica/programs-services/tifia/faqs

Sample from the above DOT FAQ…

INTRODUCTION TO TIFIA

Why was the TIFIA Program created?
TIFIA was created because state and local governments that sought to finance large-scale transportation projects with tolls and other forms of user-backed revenue often had difficulty obtaining financing at reasonable rates due to the uncertainties associated with these revenue streams. Tolls and other project-based revenues are difficult to predict, particularly for new facilities. Although tolls can become a predictable revenue source over the long-term, it is difficult to estimate how many road users will pay tolls, particularly during the initial "ramp-up" years after construction of a new facility. Similarly, innovative revenue sources, such as proceeds from tax increment financing, are difficult to predict. TIFIA credit assistance is often available on more advantageous terms than in the financial market, making it possible to obtain financing for needed projects when it might not otherwise be possible.

ELIGIBILITY REQUIREMENTS

What eligible project costs can TIFIA credit instruments be used to support?
The TIFIA statute, codified at 23 U.S.C. §601 et seq, defines eligible project costs as those expenses paid in connection with a project, including the cost of:

- Development phase activities, including planning, feasibility analysis, revenue forecasting, environmental review, permitting, preliminary engineering and design work, and other pre-construction activities;
- Construction, reconstruction, rehabilitation, replacement, and acquisition of real property (including land related to the project and improvements to land), environmental mitigation, construction contingencies, and acquisition of equipment; and
- Capitalized interest necessary to meet market requirements, reasonably required reserve funds, capital issuance expenses, and other carrying costs during construction.

Graders' comments on DOT's TIFIA FAQ:

"One of the FAQ near the top should be 'What does TIFIA stand for?' Nowhere on the page does the agency answer this question. Even if some in the target audience are likely to know already, other readers will wonder."

"Passive voice, long sentences, and wordy constructions make this technical information less accessible that many readers will need it to be."

"Font size, heading placement, and white space make it less inviting and easy to read."

"Why would I want to know the statute code as the first piece of information under eligibility?"

Infographics Examples

From the high-scoring USDA

Source: https://www.cnpp.usda.gov/expenditures-children-families-annual-report

Graders' Comments on the USDA infographic

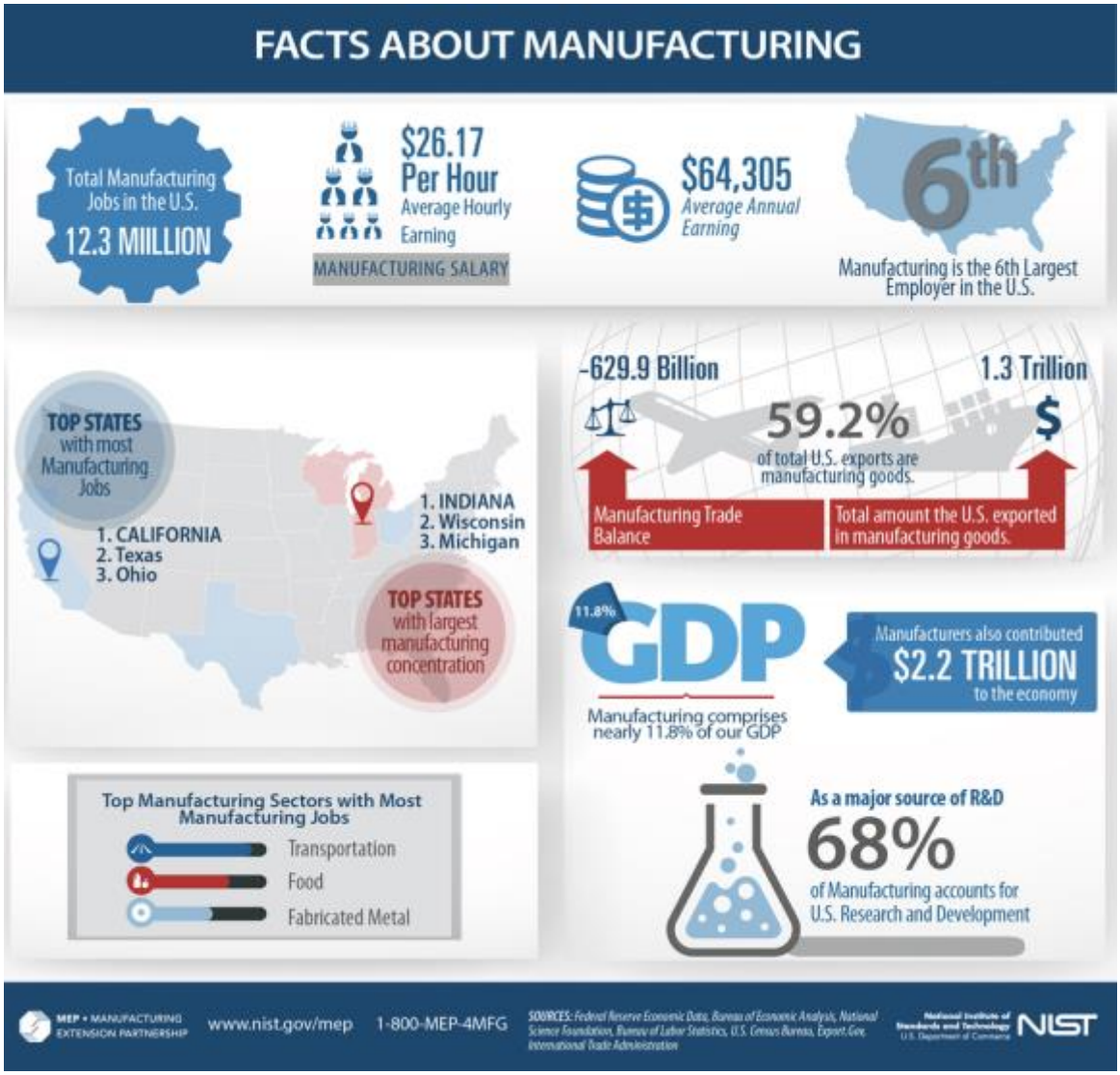
"This is a very well-done infographic! Immediately I gained a sense of the purpose of the document."

"Labels are well done, clear, and uncomplicated."

"Love this. That was my first gut reaction, and the same reaction every time I re-opened it to see what I missed the first time."

"Combines modern (today's expenses) with old-school (chalkboard, smart kid in a bow-tie) in such an effective way."

From the low-scoring Department of Commerce



Source: https://www.nist.gov/mep/why-manufacturing-matters/manufacturing-infographics/facts-about-manufacturing

Graders' comments on the Commerce infographic

"At first glance it appears helpful, but when I start looking closely at each element, I get confused."

"Several of the visual elements do not actually help make the data more clear."

"Many of the fonts are small, and some of the data needs a clearer explanation."

"The pyramid of worker icons next to the average hourly wage seems unrelated to the dollar figure or the total number of jobs."

What is the Plain Writing Act?

The Plain Writing Act of 2010 requires agencies to use language that people can understand and use in public-facing 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

In addition to grades for the use of plain language, next year's report card will once again include a Compliance grade for how well agencies fulfill the above administrative requirements, a category the Center assesses every third year.

How did the Center get involved in grading the government?

The Plain Writing Act doesn't include a mechanism to review or enforce compliance. In 2012, the Center for Plain Language began reviewing agencies' writing and compliance as a service both to Congress and to the agencies themselves. The annual Federal Plain Language Report Card provides accountability and incentive to agencies to make progress in the long process needed to transform the government-wide communication culture. We are not funded by any part of the government for this service; all the grading and preparation of this report is volunteer work.

What is the Center for Plain Language?

Creating a culture of clarity · every audience · every format · every time

The Center for Plain Language is a 501(c)(3), non-profit organization. Our mission is to champion clear communication so people and organizations can thrive.

As a volunteer organization, we support plain writing not only in the federal government but in the corporate and non-profit worlds. For example, many of our members work in the health industry, promoting equal access to vital health information. In addition to generating the Federal Report Card, the Center promotes clear through numerous other activities and projects:

- We educate Congress about the importance of plain writing. Our efforts contributed to the passing of the Plain Writing Act.
- Since 2010, we have celebrated great writing through our annual ClearMark Awards. Held at the National Press Club in May, the ClearMark awards recognize the best plain writing in English and Spanish from the public, private, and non-profit sectors. We accept submissions in January, so get planning!
- We recognize notable examples of UN-plain writing—the worst of the worst—through our WTF Awards (that's "Work That Failed," by the way). If you find a bad example, contact us and submit it through our web site!
- Though our Consultant List, we link companies and agencies who want plain language services to the best consultants in the plain language field.
- We advocate for plain language in our e-book, *Clear Communication with Clear Results: How to start a plain language program where you work*; our blogs; and at conferences—most recently in Graz, Austria, this year at the *Plain Language Association – International* (PLAIN) conference.
- We work to establish standards for plain language by cooperating with other international plain language organizations: Clarity – International, the international organization for plain legal language, and PLAIN.

Acknowledgements

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- Congressman Dave Loebsack of Iowa for his support of Plain Language and for helping publicize these results.
- Former Representative Bruce Braley of Iowa and former Senator Daniel Akaka of Hawaii, for sponsoring the Plain Writing Act of 2010.
- The plain language officials and coordinators from each federal agency who invested time in preparing their submissions for review and who work on the front lines advocating for clear communication in their agencies.
- Diane Chojnowski, Dean Draznin Communications, for coordinating our media outreach for the release of this report.

- Michelle Diaz for web communications.
- Kent Taylor, Acrolinx, for performing the review of sample submissions.
- Our graders! We particularly thank these Center volunteers who lent their communications expertise and invested their precious time to review and score the documents. Such efforts make it possible for us to undertake projects like this one as we work toward our vision of a culture of clarity:
    - Karen Carroll
    - Annetta Cheek
    - Donna Creason
    - Etta Edwards
    - Mary Hanson
    - John Hussey
    - Beth Landau
    - Colleen Ryan-Leonard
    - Natalya Matveeva

About the Author

Dr. Chip Crane, President, CPoint Consulting, serves on the executive board as the Corporate Secretary of the Center for Plain Language and the Center's Federal Report Card Lead. CPoint Consulting, a service-disabled, veteran-owned small business (SDVOSB), provides writing and document design and plain language training and other writing and speaking workshops. In addition to his work with the public and private sectors, Chip also teaches technical writing 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—more clearly as part of his life's calling. If you have questions about this report or plain language, you can contact Chip at ccrane@centerforplainlanguage.org or cecrane@cpointconsulting.com.