Department of Health and Human Services
Plain Writing Act Compliance Report
June 2014

INTRODUCTION

The Plain Writing Act of 2010 requires agencies to use "clear Government communication that the public can understand and use." This applies to all documents that are necessary for people to obtain any federal benefit or service or to file taxes, anything providing information about any federal government benefit or service, or anything explaining to the public how to comply with a requirement that the federal government administers or enforces. A helpful rule of thumb may be that all documents intended for public consumption must be written in plain writing.

The Department's Plain Writing Implementation Plan outlines objectives to integrate plain writing into HHS activities. These include:

1. Demonstrating the commitment of HHS leadership to plain writing;
2. Increasing plain writing throughout the Department;
3. Rewarding the use of plain writing; and
4. Reviewing and updating the Department's Plain Writing Implementation Plan as necessary, and demonstrating Department compliance with the Plain Writing Act.

Over the past year, the Department of Health and Human Services (HHS) has continued efforts to maintain and upgrade a consistent use of plain writing. Ongoing compliance, communication and tracking, and training, are all reflected in this ongoing progress report as to the Department's implementation, assembled with input from 26 of HHS's divisions contributing to this report:

- Administration for Children and Families (ACF)
- Administration for Community Living (ACL)
- Agency for Healthcare Research and Quality (AHRQ)
- Centers for Disease Control and Prevention (CDC)
- Centers for Medicare and Medicaid Services (CMS)
- Food and Drug Administration (FDA)
- Health Resources and Services Administration (HRSA)
- Indian Health Service (IHS)
- National Institutes of Health (NIH)
- Office of the Inspector General (OIG)
- Substance Abuse and Mental Health Services Administration (SAMHSA)
- Assistant Secretary for Administration (ASA)
- Assistant Secretary for Financial Resources (ASFR)
- Assistant Secretary for Legislation (ASL)
- Assistant Secretary for Public Affairs (ASPA)
- Assistant Secretary for Planning and Evaluation (ASPE)
- Assistant Secretary for Preparedness and Response (ASPR)
- Center for Faith-Based and Neighborhood Partnerships (CFBNP)

- Departmental Appeals Board (DAB)
- Intergovernmental External Affairs (IEA)
- Office for Civil Rights (OCR)
- Office of the General Counsel (OGC)
- Office of Global Affairs (OGA)
- Office of Medicare Hearings and Appeals (OMHA)
- National Coordinator for Health Information Technology (ONC)
- Office of the Assistant Secretary for Health (OASH)

ONGOING IMPLEMENTATION

The Office of the Chief Technology Officer developed a new website for both internal and external audiences (http://www.hhs.gov/idealab/about/) as part of its implementation of the Plain Writing Act. It is intended for audiences with different levels of health literacy. The website uses videos, graphics, and other complementary modes of communication to help employees and the public understand what the office does. Meanwhile, the Office of the Inspector General continued to ensure that in documents for the public, technical terms are explained in accessible language, and short sentences are used when possible.

The Department Appeals Board (DAB) hosted mandatory in-person plain writing training for all attorneys and judges and provided similar training for DAB's administrative staff. In addition, DAB Plain Writing Guidelines offer further guidance on plain writing principles for distribution to the attorneys. Through this training, DAB continues to ensure that all of its new documents follow plain writing principles, as required by the Act.

Since February 2013, DAB has issued decisions, rulings, or orders in plain writing in approximately 4,000 cases. As such, since February 2013 DAB has issued at least 4,000 additional letters in plain writing. These documents are required to be in plain writing not only because of the obligations imposed by the Act, but also because it is part of DAB's mission to deliver products which are thorough, well-reasoned, and concise.

Leadership within the Office of the Assistant Secretary for Preparedness and Response (ASPR) routinely reiterated the importance of compliance with the Act to ASPR senior staff during monthly staff meetings. All ASPR documents are reviewed by the Division Director of the authoring program, ASPR's Executive Secretary, the Chief Operating Officer, the Principal Deputy ASPR, and the ASPR. If a document is deemed less than adequate for any reason at any point along the way (including a failure to meet the Plain Writing Act requirements), it is returned to the authors for necessary revisions.

The Office of the Assistant Secretary for Planning and Evaluation (ASPE) has a long-term plan for training employees in plain writing that includes plain writing resources (paper and electronic), a link to a recent Plain Language webinar facilitated by NOAA, and 1-2 onsite training sessions if requested by staff.

ASFR continues to communicate the importance of writing in plain language to its employees whenever appropriate, providing access to professional development and training for all employees, including plain language as appropriate for specific roles and responsibilities.

CDC continues to use several mechanisms to track and measure progress. Its Office of the Associate Director for Communication (OADC) enters all training opportunities in the HHS Learning Portal, and makes a considerable effort to help chief information officers (CIOs) enter their training offerings, too. The portal lets CDC confirm and credit attendees. OADC runs reports in the portal to provide CIO-specific staff training data.

CDC reports that its CIOs made extensive use of plain writing in public documents, including:
- Abstracts (16 new)
- Articles (17 new)
- Brochures (21 new; 3 revised)
- Campaign messages (38 new; 2 revised)
- Contract documents (1 new)
- Controlled correspondence, decision memos, briefing documents (315 new; 1218 revised)
- Curriculum (1 new)
- Fact sheets (291 new; 39 revised)
- Feature stories (58 new; 11 revised)
- Federal register notices (5 new)
- Frequently Asked Questions (20 new; 9 revised)
- Funding Opportunity Announcements (3 new; 3 revised)
- Guidance documents (32 new)
- Infographics (54 new; 5 revised)
- Letters (108 new; 4 revised)
- Media advisories (61 new)
- Mobile apps (6 new)
- Newsletters (62 new)
- Personnel documents (12 new)
- Posters (88 new; 3 revised)
- PowerPoint presentations (33 new)
- Press releases (227 new)
- Public Service Announcements (9 new)
- Reports (86 new)
- Scripts for podcast, TV, radio (28 new; 1 revised)
- Signs (10 new)
- Social media messages (5,190 new)
- State profiles (46 new)
- Survey questions (38 new)
- Tool kits (2 new)
- Training materials (2 new)
- Web buttons (9 new)

- Webpages (899 new; 414 revised)

Additionally, the Office of the Director and the 11 CIOs include plain language principles in the standard review and clearance criteria that are applied to public documents before release. Each of the CIOs has an Associate Director for Communication Science (ADCS) who is responsible for this communication review. The agency Communication Director may also review sensitive, complex, or emergency response public materials and apply plain language criteria.

In 2013, CDC implemented a new tool called the Clear Communication Index (www.cdc.gov/healthcommunication/ClearCommunicationIndex/) that includes 4 questions and 20 items that research shows affect clear communication. The Index references the Federal Plain Language Guidelines and expands the items we consider for clear communication. Staff use the Index to score documents on a scale of 0-100; document scores are tracked and used to identify steps to increase clarity.

For example, CDC's National Center on Birth Defects and Developmental Disabilities is creating templates that incorporate the Clear Communication Index items for webpages and online publications. These templates will help programs develop and revise webpages that are compliant with plain language techniques and Index items.

For 2014, OADC is coordinating a fact sheet assessment initiative, with a primary aim of assembling a group of trained evaluators score agency fact sheets using the Index and consult with CIOs to revise for increased clarity.

FDA's continuing implementation includes:
- Weekly tips written and posted in the FDA/Employee News
- Plain Language Introduction at FDA's New Employee Orientation
- The Center for Food, Safety, and Applied Nutrition's (CFSAN) quarterly plain language
- newsletter
- The Office of Regulatory Affairs' "ORA Communications Toolbox," which includes tips
- and guidance on plain writing
- Plain Language Workgroup Meetings
- Health Literacy Workgroup Meetings
- FDA.gov Plain Language public web page
- Inside.FDA.gov Plain Language Resource Center for FDA employees
- Plain language-specific questions on the *ForeSee* public survey

HRSA measures plain writing using a combination of tools, including expert review, the Flesch Reading Ease formula and the Flesch-Kincaid Grade level test, and usability testing.

HRSA stepped up review of documents destined for the public-facing website to be sure all new web content is written in understandable language. In FY 2013, this totaled 506 documents. In addition, HRSA's Division of Policy and Information Coordination (DPIC) works with all HRSA Bureaus and Offices to ensure adherence to the Plain Writing Act, with a focus on ensuring that readers will be able to comprehend the information we put forward.

HRSA's Division of Transplantation also directed its Organ Procurement Transplantation Network (OPTN) contractor to rewrite OPTN's policies using plain language. This was a significant undertaking as the policies are extensive and cover the work of more than 24 standing organ specific committees.

SAMHSA is converting webpages into plain writing as part of "Project Evolve," its website modernization project. This multi-year project requires the consolidation of content from 88 websites to unify all Agency information into one main website, SAMHSA.gov. As content is migrated from its current site to a staging site, it is checked for plain writing. If the content does not comply with federal plain writing guidelines, it is rewritten before it is posted to the "new SAMHSA.gov" beta site. SAMHSA is carefully reviewing and adapting complex terminology that is usually familiar only to professional audiences into lay terms that the general public can understand. SAMHSA requires that all new content be compliant with plain writing guidelines before the content is published to the "new SAMHSA.gov."

SAMHSA is using web analytics and user feedback to determine the order in which web content is migrated into the "new SAMHSA.gov." Topics are prioritized by the highest level of public interest, as well as topics related to SAMHSA and HHS's strategic priorities.

The National Institutes of Health Office of Communications & Public Liaison (NIH-OCPL) developed a user-friendly, interactive training for online use called, "Getting Started or Brushing Up." The training includes a checklist and a completion certificate and is being used by other agencies as well as NIH and the general public. It can be found here:
> http://www.nih.gov/clearcommunication/plainlanguage/gettingstarted/index.htm/.

NIH-OCPL completed a formal study, supported by the evaluation set-aside program, to evaluate specific needs of our wide variety of stakeholders. Much was learned about strategies to make information more accessible and better targeted to specific audiences. NIH-OCPL is framing an implementation plan that will begin in 2014.

NIH National Center for Complementary & Alternative Medicine (NCCAM) developed standard operating procedures for clearances that include multiple editorial reviews. Communications staff and contractors have taken the NIH Plain Language training and Plain Language: "Getting Started or Brushing Up" online training.

The National Institute on Alcohol Abuse and Alcoholism (NIAAA) developed a variety of new publications in 2013, all of which incorporated plain language principles:
- Alcohol Use Disorder: A Comparison Between DSM-IV and DSM-5
- Alcohol Overdose: The Dangers of Drinking Too Much
- Alcohol Research: Current Reviews: NIAAA Scientific Review Journal
- Measuring the Burden-Alcohol's Evolving Impact on Individuals, Families, and Society, Vol.35, No. 2, 2013
- Epigenetics-New Frontier for Alcohol Research, Vol. 35, No. 1, 2013
    - NIAAA Polices and SOPs
- Telework Policy

- NIAAA Compensatory Time for Travel (CTT) – Policy & Standard Operating Procedure (SOP)
- Training Policy and SOP
- ORM Newsletter article request SOP

These documents are all available to NIAAA employees through their intranet.

The National Institute of Arthritis and Musculoskeletal and Skin Diseases (NIAMS) produced or updated more than 50 health information pieces for patients and members of the public. Two dozen of the fact sheets and booklets about bone, joint, and skin conditions were new publications. The remainder were updates to existing materials. NIAMS is committed to making health information available to all U.S. residents, without consideration for their education level or what language they speak. Many of the new publications were Korean, Vietnamese, and Chinese translations of the Institute's "Fast Facts, Easy-to-Read" English language series.

NIAMS also developed 20 new "Spotlights on Research"—short, lay-friendly descriptions of recent scientific papers that are posted on the NIAMS website. NIAMS leadership forwarded a reminder all-hands memo that included an explanation of the importance of plain language and included many useful resources.

The National Institute of Diabetes and Digestive and Kidney Diseases (NIDDK) produced the following materials in plain writing:
- 30 revised English fact sheets
- 14 revised English booklets
- 3 revised English/Spanish Awareness & Prevention series fact sheets
- 1 new English booklet
- 2 revised English tip sheets
- 10 revised Spanish booklets
- 6 new Spanish fact sheets
- 3 new Spanish brochures

Several sections of the National Institute of Nursing Research (NINR) website were completely rewritten to make them plain language, including the home page (1 page); the Division of Intramural Research (DIR) section (approx. 25 pages); News & Notes e-newsletter (was one long page, now each story has its own page); and others such as the FOIA and Policies pages.

NINR used plain language when it added several new sections to its website. These include the pediatric palliative care campaign section (5 pages); the Innovative Questions initiative section (5 pages); and the Key Themes section (7 pages). NINR created a new Social Media page, which includes the social media comment moderation policy (1 page).
In 2013, NINR also launched a Twitter account, @NINR, which follows plain language principles in both tweets (more than 400 tweets sent since April 2013) and hashtags.

In terms of print materials, NINR followed plain language principles closely in developing the hard-copy materials for its new campaign, "Palliative Care: Conversations Matter." Several

conference materials were also redesigned, including the extramural grant mechanisms table and the list of extramural program director contacts. A new DIR training flyer follows plain language as well.

All four brochures in the "Don't Lose Sight of" series by the National Eye Institute (NEI) have been updated and reflect plain language. These publications are for people at risk for eye disease. All 15+ fact sheets on the NEI website have been written in plain language. All 20+ online tips sheets and articles for the National Eye Health Education Program have been prepared in plain language. The NEI continues to produce all documents for the public in plain language.

The National Institute of Child Health and Human Development (NICHD) has been incorporating plain writing in all of its publications and web content intended for public distribution since before the 2010 Act was passed, in compliance with previous legislation and guidelines. The Institute has continued to do so since the Act was passed.

All NICHD publications and web content, intended for public distribution and related to topics of public health, follow the tenets of plain writing, as outlined in the Act and in prior legislation and guidelines. The redesigned NICHD website incorporates and is built around plain language tenets, especially in the information for consumers and the public within the 75 "A to Z Topics." Efforts are underway to update the existing 75 topics, including the addition of headings and subheadings and bullets to help readers move through the content more easily, and to create additional topics, which will also incorporate plain language tenets. The website information has been our primary focus during the last year as a replacement for many printed publications.

NICHD also created new and revised existing materials—about 20 items in all—related to health education programs and campaigns that follow plain language.

The National Institute on Deafness and Other Communication Disorders (NIDCD) developed materials to help staff become more familiar with plain language concepts and to offer a style guide for better consistency in NIDCD documents. These materials were posted on the NIDCD intranet and include:
- The NIDCD Writing and Editorial Style Guide
- Plain Language page
- Website glossary

NIDCD also developed materials for the Institute's 25th Anniversary, using plain language principles, as below:
- Infographics
- Anniversary Timeline
- EHDI Infograph
- Noisy Planet infographs/tips

NIDCD continues to increase the number and frequency of the "Noisy Planet e-Bulletin," an e-mail newsletter for people interested in the noise-induced hearing loss prevention campaign, Noisy Planet.

The National Institute of Biomedical Imagine and Bioengineering created a web redesign to improve clarity and accessibility, created multiple new science education fact sheets (for the general public, students, and teachers), science highlights, a Director's newsletter (to grantees), and multiple social media postings—all in plain language.

The Digital Communications Division (DCD) of the Assistant Secretary for Public Affairs has undertaken a significant refresh of HHS.gov over the past year. This effort includes plain language improvements to site content as measured against the Flesch-Kincaid readability scale. DCD used plain language to improve the findability of important HHS information in our search engines and reorganized content to improve readability and access on mobile devices. DCD regularly incorporates plain language as part of training for employees that write and edit web-based content for HHS sites.

PRODUCT EXAMPLES

The following are written in plain language and are available to the public on the Internet:

HRSA
- http://www.hrsa.gov/opa/ (all webpages)
- http://bphc.hrsa.gov/spotlight/ (eight grantee stories)
- http://www.hrsa.gov/grants/apply/ (all webpages)
- http://www.hrsa.gov/grants/apply/register/
- http://www.hrsa.gov/affordablecareact/
- http://organdonor.gov/

CDC
- Older drivers in the workplace: www.cdc.gov/niosh/docs/2005-159/
- Diseases and vaccines that prevent them: http://www.cdc.gov/vaccines/hcp/patient-ed/conversations/prevent-diseases/provider-resources-factsheets-infants.html/
- Teen pregnancy: http://www.cdc.gov/TeenPregnancy/AboutTeenPreg.htm/
  - Bacterial Vaginosis fact sheet: http://www.cdc.gov/std/bv/default.htm/
  - Gonorrhea fact sheet: http://www.cdc.gov/std/gonorrhea/default.htm/
  - Human papillomavirus fact sheet: http://www.cdc.gov/std/HPV/STDFact-HPV.htm/

FDA
- *Center for Tobacco Products Overview* http://www.fda.gov/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/AbouttheCenterforTobaccoProducts/ucm383225.htm
- *Informing Tobacco Regulation through Research* http://www.fda.gov/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/AbouttheCenterforTobaccoProducts/ucm383161.htm
- *Implementing the Tobacco Control Act through Policy, Rulemaking, and Guidance*

http://www.fda.gov/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/AbouttheCenterforTobaccoProducts/ucm383160.htm

- *Ensuring Compliance with the Tobacco Control Act and Enforcing the Law*
  http://www.fda.gov/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/AbouttheCenterforTobaccoProducts/ucm383159.htm
- *Public Education Campaigns*
  http://www.fda.gov/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/AbouttheCenterforTobaccoProducts/PublicEducationCampaigns/default.htm

NIH: NEI
- http://www.nei.nih.gov/health/pdf/Glaucoma_Consumer_English_Color.pdf
- http://www.nei.nih.gov/health/pdf/Glaucoma_Consumer_English_BW.pdf
- http://www.nei.nih.gov/health/lowvision/LivingWithLowVisionBooklet.pdf

NIH: NICHD
- https://www.nichd.nih.gov/publications/pubs/Documents/Discover_the_NICHD.pdf
- https://www.nichd.nih.gov/publications/pubs/Documents/GestationalDiabetes_Espanol_2013.pdf
- https://www.nichd.nih.gov/publications/pubs/Documents/Safe_Sleep_Grandbaby_2013.pdf
- https://www.nichd.nih.gov/sts/Pages/default.aspx/
- https://www.nichd.nih.gov/health/topics/adrenalgland/conditioninfo/Pages/default.aspx/

NIH: NIDDK
- 4 Steps to Control Your Diabetes For Life
- Be Active If You Have Diabetes
- Choose More Than 50 Ways to Prevent Diabetes

NIH: NINR
- http://www.ninr.nih.gov/sites/www.ninr.nih.gov/files/ninr-strategic-plan-2011.pdf
- http://www.ninr.nih.gov/newsandinformation/conversationsmatter
- http://www.ninr.nih.gov/sites/www.ninr.nih.gov/files/palliative-care-brochure.pdf

National Vaccine Program Office
- http://www.vaccines.gov/who_and_when/index.html
- http://www.vaccines.gov/getting/expect/for_children/index.html
- http://www.vaccines.gov/getting/pay

President's Council on Fitness, Sports, and Nutrition:
- http://www.health.gov/paguidelines/midcourse/infographic.pdf
- http://fitness.gov/blog-posts/healthy-holidays-2013.html
- http://fitness.gov/blog-posts/lmas_making_strides_nationwide.html

ASPA-Digital Communications Division

- Updated the HHS Careers site to provide simpler and accurate information
- Developed pages on content strategy and on how to write strong content that include information on plain language.
- Reorganized the About HHS section of the site to better categorize the content, including an expansion of the Family of Agencies page to provide more information with less jargon.

TRAINING

Agencies throughout the Department have taken steps to increase employee training in accordance with the Plain Writing Act.

FDA

        With employees throughout the United States (19 district offices) and the world (7 global offices), FDA aims to reach all employees who write covered documents.

        FDA is developing an FDA-specific Web-based, Basic Plain Language Training Modules, due to be completed in September 2014. Instructor-led classroom training included 17 classes and trained 580 employees.

HRSA

        HRSA's Division of Policy and Information Coordination (DPIC) offers staff a resource in plain writing— "Using Word as a Tool to Aid in Plain Writing"—and shared this resource with other HHS OpDivs through the HHS Best Practices Group. DPIC also routinely provides staff with updates to the Department's "Guide to Document Preparation" as an additional resource.

        The HRSA Office of Communications offers ad hoc plain language training and, for website content contributors, a creative workshop focused on writing for the web. Website content contributors are also encouraged to attend GSA web writing workshops and webinars.

CDC

        Plain writing is part of CDC's strategic efforts in clear communication and health literacy. CDC/ATSDR has an internal Action Plan to Improve Health Literacy, which is based on the HHS National Action Plan to Improve Health Literacy: http://www.health.gov/communication/HLActionPlan/.

        CDC University offers health literacy, clear communication, plain language, and web development courses to staff on a periodic basis and consults with CIOs to schedule training based on need.

        Between February 2013 and January 2014, CDC trained 993 staff who draft, edit, or review public health and safety information in plain writing. An additional 1,423

individuals without specific duties in public communication, but who were believed to benefit from the training, were also trained.

National Vaccine Program Office (NVPO)
> Select members of the NVPO staff took training (http://www.plainlanguage.gov/resources/take_training/), and regularly review http://www.plainlanguage.gov.

Presidential Commission for the Study of Bioethical Issues
> Although Bioethics Commission written products are not covered by the Plain Writing Act, Bioethics Commission staff members are required to take an online training on plain language administered by NIH. The course teaches techniques for clear and concise writing, especially in communicating about science and public health.

Office of Minority Health (OMH)
> OMH conducts an Annual Policies and Procedures Training session, including training on correspondence guidelines and plain language writing tips.

Office of Disease Prevention and Health Promotion (ODHP)
> Members of the health communication division in ODHP take training courses as *refreshers* (e.g., GSA's Plain Writing Workshop) and participate in events that help train others in plain language/health literacy (e.g., webinar on health literacy for the advisors/stakeholders for the 2015 Dietary Guidelines for Americans).

Office of Adolescent Health (OAH)
> Distribution of OASH and OS style guidance; writing webinars for OAH staff; distribution and purchase of Strunk and White's, The Elements of Style.

Office of Research Integrity (ORI)
> Currently staff are encouraged (and those who review for plain language are required) to take the NIH online Plain Writing training. However, ORI plans to set up the PLAIN Writing in-person training, available through OPM, in the summer.

Office of Population Affairs
> NIH's Plain Language Online Training is required to be completed by all staff. Internal document reviews include discussions of the document with staff to improve clear messaging and language which compliments the target audience's reading and health literacy levels. Periodic review of the website allows staff to identify unclear items and suggest changes using plain language.