

Plain Writing Act Compliance Report of the Farm Credit Administration

April 15, 2024



The Farm Credit Administration recognizes the importance of plain writing, and we strive to ensure that all the documents we issue are written clearly. By doing so, we accomplish our mission more effectively, and we comply with the requirements of the Plain Writing Act of 2010.

The Plain Writing Act requires federal agencies to write "clear government communication that the public can understand and use." In July 2011, we issued a [Plain Writing Act Implementation Plan \(PDF\)](#) to ensure that we meet the requirements of the law.

This report describes our plain writing program and our activities over the past 12 months to support plain writing at FCA.

Recent plain language reviews

For many of the documents that are posted on the FCA website, the editors in the Office of Congressional and Public Affairs (OCPA) perform comprehensive plain language reviews. Over the past 12 months, OCPA editors reviewed nine [informational memorandums](#), one [bookletter](#), and several memorandums. These documents provide information and guidance to the financial institutions we regulate.

When performing plain writing reviews, OCPA editors work closely with all content authors to ensure that the edits made to achieve clarity still convey the authors' intended meaning.

OCPA also uses the plain writing application StyleWriter to measure the effectiveness of their plain writing reviews. (See below for more information about StyleWriter.) OCPA editors run original versions of all documents through StyleWriter; after editing the documents and working with authors to finalize the content, they run the final versions through the application. According to StyleWriter metrics, the plain language reviews markedly improve the documents' "bog index," or readability, as well as other plain writing indices, such as jargon and grade level.

Other FCA documents undergo plain language reviews within their originating offices. Our Office of Examination has emphasized the importance of plain writing reviews by including plain writing guidelines in the internal control document that FCA examiners must use when they review reports of examination.

Over the past 12 months, OCPA editors also provided plain language reviews of the agency's three major reports:

- [FCA Annual Report \(PDF\)](#)

- [FCA Performance and Accountability Report \(PDF\)](#)
- [FCA Proposed Budget and Performance Plan \(PDF\)](#)

Plain writing training for FCA writers

In June of 2023, FCA held a plain writing course with instructor Leslie O’Flahavan, owner of E-WRITE, a writing training consultancy. Attending the two half-day sessions were approximately 19 agency writers from our Office of Regulatory Policy, with some participants in person and some remote.

Using examples from FCA’s older guidance documents, Leslie illustrated many of the principles of plain writing and the power of using these principles to communicate more effectively. The training was well received.

In addition, OCPA editors shared plain writing guidance they had developed specifically to support the agency’s subject-matter experts who write content that is published on our website.

The guidance begins with a short list of rules, together with cross-references to more extensive information in the Federal Plain Language Guidelines. Here’s an example:

Use “we” when referring to FCA, and use “you” when referring to your audience. “More than any other single technique, using ‘you’ pulls users into your document and makes it relevant to them.” (Guidelines, 30–32)

The bulk of the guidance consists of a table containing 15 before-and-after examples of plain language edits that were made to recently published informational memorandums and bookletters.

The first column of the table shows the “before” content, which was taken from the draft that the subject-matter experts submitted to OCPA for editing. The second column shows the “after” content, reflecting the plain language edits that were approved for final publication. The third column provides a detailed explanation of the edits made, together with cross-references to related material in the Federal Plain Language Guidelines.

Further resources to support plain writing at FCA

Plain writing intranet site

OCPA maintains a plain writing page on the FCA intranet site in SharePoint. As the screenshot below shows, this page provides FCA employees with information about training, the FCA plain writing award, and links to numerous plain writing resources, including the agency’s style guide. It also encourages employees to reach out to OCPA for grammar or writing style questions.



FCA style guide

In late 2015, OCPA worked with plain language consultant Ginny Redish to finalize a style guide for the use of all FCA employees. We modeled the style guide after the National Archives' guide. For the most part, our guide follows the style conventions of the Associated Press. In addition to providing guidance on punctuation, capitalization, and other style issues, the guide contains a section on plain writing. It includes many examples from FCA documents.

A plain writing technology tool: StyleWriter

FCA holds an enterprise-wide license for StyleWriter, an application that FCA writers can use to measure and improve the clarity of their writing. Among other measures, StyleWriter provides a "bog index." This measure considers sentence length, word difficulty, the use of abbreviations, passive verbs, and other variables. OCPA periodically publishes reminders in the employee newsletter to encourage FCA writers to take advantage of this resource.

FCA publication resources

In 2016, we launched a publication resources SharePoint site. As the screenshot below shows, we also offer numerous Word templates for common agency documents. These documents facilitate 508 compliance and ensure formatting consistency in our written materials.



Style guide	Templates	Photos and videos	FCA logos and seals	Other resources
<p>FCA Style Guide</p> <p><i>Questions? Comments? Additions to suggest?</i></p> <p><i>We welcome your feedback.</i></p>	<p>Word templates for standard FCA documents are available in your Word software. Click File, New, then select the "Shared" or "Custom" tab</p>	<p>Be careful about using an image from the internet because it may be copyrighted. You can use clip art or photos in any program on your agency laptop.</p>	<p>FCA publications, both internal and external, use the official FCA logo or seal. Producing materials bearing nonstandard logos and seals undermines the consistency</p>	<p>Editorial Policy and Submission Guidelines for FCA Today articles</p> <p>"Ask the Editor" series in FCA Today</p>

FCA's plain writing website

[Plain Writing at FCA](#) is the agency's official plain writing web page. A link to the page is available from our homepage. To give the public an opportunity to report FCA documents that are difficult to understand, the agency's plain writing web page provides contact information for Emily Yaghmour, the agency's plain writing coordinator. As of yet, we have received no feedback from the public through our plain writing web page.

FCA documents covered by the Plain Writing Act

FCA has identified the following agency documents as covered by the Plain Writing Act:

- Reports of examination
- Informational memorandums
- Bookletters
- Policy statements
- Legal opinions
- Major agency reports
- Text for the website
- Regulatory preambles

The following table provides more detail about some of these documents.

Publication type	Audience	How we ensure these documents comply
All major agency reports, all of which are available on our website	<p>These documents have multiple audiences:</p> <ul style="list-style-type: none"> • Representatives of the Farm Credit System • Members of Congress • Media representatives • The general public 	OCPA editors review these documents for clarity and work with content authors to revise them.

Publication type	Audience	How we ensure these documents comply
Reports of Examination—presented to management and board directors at the institutions we regulate	<p>Management and board directors at Farm Credit System institutions review these reports, which FCA examiners produce to document findings from the exams they perform.</p> <p>Approximately 10 to 20 individuals review each report. The System consists of 60 banks and lending associations.</p>	Supervisory examiners now review these reports for clarity before they are issued.
Guidance documents for Farm Credit System institutions, including informational memorandums and board policy statements	<p>Management and board directors at Farm Credit System institutions review these documents. The number of readers ranges from 1,000 to 2,000.</p> <p>However, because these documents are posted on our website, the general public may also read them.</p>	OCA editors provide a comprehensive plain writing review of each of these documents before distributing and posting to the agency website.
News releases	The primary audiences include agricultural and finance reporters and representatives of the Farm Credit System. We send our releases to more than 500 reporters in print and broadcasting.	OCA editors work closely with subject-matter experts to ensure that our press releases are written clearly.
FCA website	<p>The audiences for our website include the following:</p> <ul style="list-style-type: none"> • Representatives of the Farm Credit System • Borrowers and potential borrowers • Members of the media • Members of Congress • The general public 	In 2018, we revamped our website. We reviewed all the pages for plain writing and rewrote much of the content. The vendor that worked with us to revamp the site also provided some plain writing guidance.
FCA Today, the agency's electronic employee newsletter	The agency's workforce of more than 300 individuals constitutes the audience for the newsletter.	Individuals from across the agency submit content for the newsletter to the Office of Congressional and Public Affairs. OCA editors provide plain-language edits to the articles and clear these edits with the article authors.

FCA's plain writing training program

Since starting the program in 2011, we have provided training in various ways. The table below shows training that has occurred since April 14, 2023. In addition, we published an article in November 2023 in our employee newsletter to notify employees about plain language seminars offered by the Small Agency Council. We published an article in January 2024 to notify employees about another Small Agency Council class on business writing and email etiquette.

Type of Training	Number of Employees Trained
<p>Online training for new employees. To provide plain writing training to new employees, we adapted Kathryn Catania’s plain writing PowerPoint presentation for our purposes. Leland A. Strom, the agency’s chairman and CEO from 2008 to 2012, narrated the slides. Every new employee is required to view the presentation online. This training is also available on our plain writing SharePoint page for use by all employees.</p>	42 employees
<p>One-time training for staff in the Office of Regulatory Policy. As noted above, FCA offered two half-day training sessions in June 2023 for employees in our Office of Regulatory Policy. Conducted by Leslie O’Flahavan of E-WRITE, the training covered plain language principles and how to apply them in our work at FCA.</p>	19 employees
<p>Self-study curriculum. Our Office of Examination provides a self-study curriculum — POWER Writing I and II. These courses, which were developed by a contractor in 2020, cover many of the principles in the Federal Plain Language Guidelines. These two courses are part of the mandatory training that all associate examiners receive when they join FCA.</p>	<p>Writing I– 16 employees</p> <p>Writing II– 18 employees</p>

For more information

If you have any questions about FCA’s plain writing activities, please contact one of the following individuals:

- Trevor Reuschel, director of the Office of Congressional and Public Affairs, who also serves as FCA’s senior agency official for plain writing. His email address is reuschelt@fca.gov.
- Emily Yaghmour, deputy director of the Office of Congressional and Public Affairs, who serves as the agency’s plain language coordinator. Her email address is yaghmoure@fca.gov.