

Plain Writing Act Compliance Report of the Farm Credit Administration

April 16, 2018

FCA staff who are responsible for Plain Writing Act compliance

- Mike Stokke, director of the Office of Congressional and Public Affairs, is the senior agency official for plain writing. His email address is stokkem@fca.gov.
- Emily Yaghmour, writer/editor in the Office of Congressional and Public Affairs, is the agency's plain language coordinator. Her email address is yaghmoure@fca.gov.

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, such as the Annual Report on the Farm Credit System, the Performance and Accountability Report, and the Annual Proposed Budget and Performance Plan
- Text for the website
- Regulatory preambles

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

Table 1. FCA documents to which plain language principles are applied

| 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 | Staff members in the Office of Congressional and Public Affairs edit these documents. They are well trained in the principles of plain writing. |
| Reports of Examination — presented to directors on the boards of the institutions we regulate | <p>Directors on the boards of Farm Credit System institutions review these reports. FCA examiners use these reports to document findings from the exams they perform.</p> <p>Approximately 10 to 20 individuals (the institution’s directors and members of management) review each report. The System consists of 73 lending institutions.</p> | Supervisory examiners now review these reports specifically for their clarity. |
| Guidance documents for Farm Credit System institutions, including informational memorandums and board policy statements. | <p>Directors on the boards of Farm Credit System institutions, as well as members of management, review these documents. The number of readers range from 1,000 to 2,000.</p> <p>However, because these documents are also posted on our website, the general public may also read these documents.</p> | <p>Each major office division in the agency now has a designated plain writing reviewer. The reviewer for the office that is primarily responsible for producing a particular document reviews it for clarity.</p> <p>Occasionally, the office division requests the agency’s plain writing coordinator to edit documents for plain language.</p> |
| News releases, issued electronically and posted on the agency’s website | The primary audiences include agricultural and finance reporters and representatives of the Farm Credit System. We send our releases to more than 300 reporters in print and broadcasting. | <p>Since long before the Plain Writing Act was enacted, we have worked hard to write our releases in journalistic style.</p> <p>As a result of plain writing training, FCA writers and editors are more knowledgeable of the principles of plain writing.</p> |
| 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 | <p>In 2007, we substantially revised the content of our website to incorporate the principles of plain writing.</p> <p>We applied many of the same principles that are described in the Federal Plain Language Guidelines.</p> |

| Publication type | Audience | How we ensure these documents comply |
|--|--|---|
| FCA Today, the agency's electronic employee newsletter | The agency's workforce of about 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. OCPA editors provide plain-language edits to the articles and clear these edits with the article authors. |

How we communicate Plain Writing Act requirements to staff

On FCA's intranet site, we maintain a plain writing SharePoint site as part of the FCA intranet. This page

- describes the documents we produce that must comply with the Plain Writing Act;
- provides employees with information about training;
- provides links to many plain writing resources;
- refers employees to StyleWriter, a tool on the agency's network that employees can use to help them evaluate the clarity of their documents; and
- encourages submissions for consideration for the annual FCA Plain Writing Award.

In 2016, we launched a Publication Resources SharePoint site. It contains the new agency style guide in HTML and PDF formats. Chapter 2 of the style guide focuses on writing in plain language.

Also, since April 2017, we have published the following articles in FCA Today, the agency's electronic employee newsletter:

- July 12, 2017: Ask the Editor: Who You Gonna Call — My Colleagues and I? Or My Colleagues and Me?
- Sept. 27, 2017: It's Plain and Simple: Submit Your Plainest Writing by Halloween for a Chance to Win OCPA's Plain Writing Contest
- Oct. 30, 2017: Plain Writing Award Deadline Extended to Friday, Nov. 3
- Nov. 2, 2017: Reminder: Send in Submissions for Plain Writing Award by Tomorrow, Nov. 3
- Jan. 17, 2018: Ask the Editor: How Do I Write a Clear List?
- March 21, 2018: Ask the Editor: Why Shouldn't I Use "Click Here"?
- March 28, 2018: Plain Writing Wednesday: The Value of Keeping It Brief
- April 12, 2018: Plain Writing Wednesday: Say It Simply

At the end of October, staff in the Office of Congressional and Public Affairs used a more playful approach to reinforce plain writing principles among FCA employees. We decorated an office door using a Day of the Dead theme. The door featured paper and plastic skulls with speech bubbles condemning plain writing infractions (e.g., Death to the Passive Voice! Death to "Click here"! Death to acronyms!)

Since starting the program in 2011, we have provided training in various ways. The following table shows training that has occurred since April 15, 2016.

Table 2. FCA plain writing training, April 17, 2017 – April 16, 2018

| Type of Training | Number of Employees Trained | Date |
|--|--|---------------------------------|
| <p>Online training for new employees. To provide plain writing training to new employees, we have 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.</p> <p>We have also posted the training on our Plain Writing SharePoint page for use by all employees.</p> | 25 | April 17, 2017 – April 13, 2018 |
| <p>Ask the Editor article series. In March 2015, editors in the Office of Congressional and Public Affairs announced a new article series called “Ask the Editor” for publication in the employee newsletter. The articles in the series address questions posed by agency employees on grammar and plain language. We hope that the series, in addition to answering specific questions, creates more discourse among employees about language and raises awareness of the value of clarity.</p> | Undetermined | March 2015 – Present |
| <p>Online training, which consists of two courses, Writing I and Writing II. These courses, which were developed by a contractor several years ago for use by FCA employees, 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 course: 10</p> <p>Writing II course: 16</p> | April 17, 2017 – April 16, 2018 |

Note: In 2011, each of the agency’s senior managers identified all employees in his or her office who either write or edit documents that would be considered covered by the Plain Writing Act. In all, 57 employees were identified. FCA made plain writing training mandatory for all of these employees. Ninety-three percent of these employees received the training.

Awards program

We have developed a plain writing awards program for which offices submit documents that are exemplary for their clarity. The agency presents annual awards to the authors of the winning documents.

Last year (2017) was the fifth consecutive year that we presented plain writing awards. See the timeline for more details.

Clearance process

Staff in the Office of Congressional and Public Affairs reviews and edits many agency documents for clarity and ease of use. To measure the effectiveness of these reviews, we sometimes run the StyleWriter application on documents before and after reviewing them.

Most agency documents receive plain language reviews within their originating offices. All major offices in the agency have designated plain writing reviewers. These individuals

review covered documents produced by their offices to ensure that they are plainly written. FCA's plain writing coordinator held a training session for the reviewers in March 2013.

In addition, the plain writing reviewer for our Office of Examination added the following element to an internal control document that FCA examiners must use when they review reports of examination:

Was the report edited for plain language with consideration of the following?

- *Written for the average reader*
- *Organized to serve the reader's needs*
- *Uses headings*
- *Uses "you" and other pronouns*
- *Uses active voice*
- *Uses short sections and sentences*
- *Uses simplest tense possible*
- *Uses base verbs, not hidden verbs*
- *Omits excessive words*
- *Uses "must" to express requirements*
- *Places words carefully*
- *Uses lists and tables*
- *Uses no more than two or three subordinated levels*

Style guide

In late 2015, the Office of Congressional and Public Affairs 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. In April 2016, we published the guide in a wiki library on the agency's intranet site. The guide should be a valuable resource to all of the agency's writers and editors, and particularly to our plain writing reviewers.

Implementation timeline

We set up our plain writing program in 2011. The following table shows a timeline for the implementation of the program.

Table 3. FCA's timeline for implementing the Plain Writing Act

| Action | Target Deadline | Results |
|--|-----------------|--|
| The agency will train all employees who write or edit documents covered by the Plain Writing Act. | April 13, 2012 | Ninety-three percent of the 57 employees for whom training was mandatory have received training. In addition, 54 employees for whom the training was not mandatory have received training. |
| FCA will complete an online training presentation that will serve as mandatory plain writing training for all new FCA employees. | April 13, 2013 | The agency began using the online training presentation in August 2012. |
| The agency will implement an awards program to recognize examples of plain writing. | April 13, 2013 | The chair of the FCA board approved creation of the plain writing award program in March 2013, and the awards program was announced to senior managers in April. |
| FCA will provide resources and guidance to plain writing reviewers throughout the agency. | April 13, 2013 | FCA held a training session for five plain writing reviewers on March 20, 2013. |
| In July 2013, FCA announced the 2013 FCA Plain Writing Award in its electronic employee newsletter. The announcement encouraged employees to submit documents to be considered for the award. In November, a panel of reviewers from across FCA gathered to review and judge 11 submissions. | December 2013 | In a ceremony on Dec. 11, 2013, FCA board chair Jill Long Thompson presented plain writing awards to two FCA employees. |
| On Oct. 29, 2014, we hired Ginny Redish, renowned plain language expert and author of "Letting Go of the Words," to deliver a half-day workshop to FCA employees. | Oct. 29, 2014 | Approximately 30 employees, including many examiners and attorneys, attended the training. We collected 23 surveys, ranking the workshop as "excellent" or "very good." |
| In October 2014, FCA employees submitted 14 documents for consideration for the 2014 Plain Writing Award. The panel of judges selected a winning document written by two FCA employees. | December 2014 | In a ceremony on Dec. 11, 2014, FCA board chair Jill Long Thompson presented Plain Writing Awards to two FCA employees. |
| In October 2015, FCA employees submitted 10 documents for consideration for the 2015 Plain Writing Award. The panel of judges selected a winning document. | December 2015 | In the agency's annual awards ceremony on Dec. 9, 2015, FCA board chairman Kenneth A. Spearman presented the author of the document with the 2015 Plain Writing Award. |
| In October 2016, FCA employees submitted 10 documents for consideration for the 2016 Plain Writing Award. The panel of judges selected a winning document. | December 2016 | In the agency's annual awards ceremony on Dec. 8, 2016, FCA board chairman Dallas P. Tonsager presented the author of the document with the 2016 Plain Writing Award. |

| Action | Target Deadline | Results |
|---|-----------------|---|
| In October 2017, FCA employees submitted seven documents, or portions of documents, for consideration for the 2017 Plain Writing Award. Using StyleWriter statistics on each document and a checklist from plainlanguage.gov, the panel of judges selected two winning documents. | December 2017 | In the agency's annual awards ceremony on Dec. 14, 2017, FCA board member Jeff Hall presented the authors of two documents with the 2017 Plain Writing Award. |
| In spring 2018, we hired a contractor to help us redesign and upgrade our website. Part of this process involves reviewing the site for plain language and improving the clarity of web content. | May 2018 | |

Agency's plain writing website

[Plain Writing at FCA](http://www.fca.gov/home/plainwriting.html) is the agency's official plain writing web page. It is located at www.fca.gov/home/plainwriting.html. A link to the page is available from our homepage.

Our plain writing page contains a link to the [FCA Plain Writing Act Implementation Plan](#), which was published on July 8, 2011.

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 Yagmour, the agency's plain writing coordinator.

As of yet, we have received no feedback from the public, either positive or negative, through our plain writing web page.