

# Plain Writing Act Compliance Report of the Farm Credit Administration

April 15, 2021

## 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](mailto:stokkem@fca.gov).
- Emily Yaghmour, deputy director of the Office of Congressional and Public Affairs, is the agency's plain language coordinator. Her email address is [yaghmoure@fca.gov](mailto: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"> <li>• Representatives of the Farm Credit System</li> <li>• Members of Congress</li> <li>• Media representatives</li> <li>• The general public</li> </ul>	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 72 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 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>Frequently, 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"> <li>• Representatives of the Farm Credit System</li> <li>• Borrowers and potential borrowers</li> <li>• Members of the media</li> <li>• Members of Congress</li> <li>• The general public</li> </ul>	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.

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

### *Demonstrating the plain writing review process*

FCA encourages its staff to review documents for plain language before sending them out or posting them, but employees don't always know what to look for when doing so. Recently, the editors in the Office of Congressional and Public Affairs (OCPA) identified an opportunity to clarify that process.

In its 2020 Federal Plain Language Report Card, the Center for Plain Language identified some shortcomings in the COVID-19 webpages on federal agency websites. Although the Center for Plain Language did not evaluate FCA's COVID-19 webpage, OCPA editors recognized some opportunities to improve the FCA page. For example, they broke up the long lists of links by putting them in new expandable panels with useful headings. This made the page considerably shorter, reducing the need for extensive scrolling.

Recognizing that this was a good opportunity to illuminate the plain writing review, the editors then published an article in the agency's newsletter to outline the changes they made and the reasons for making them.

### *FCA plain writing SharePoint site*

On FCA's intranet site, we maintain a plain writing SharePoint site. In March 2020, we redesigned this page to make it more user-friendly and engaging. The purpose of the page is as follows:

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

### *FCA publication resources SharePoint site*

In 2016, we launched a publication resources SharePoint site. It contains the agency style guide in HTML. Chapter 2 of the style guide focuses on writing in plain language. We added a link to the style guide from the homepage of our intranet site for quick access.

### **Articles in the employee newsletter about plain writing**

Since April 2020, we have published the following articles in FCA Today, the agency's electronic employee newsletter:

- "Check out our new and improved COVID-19 page at fca.gov," March 11, 2021
- "Celebrate National Proofreading Day today and every day by proofreading everything you write," March 8, 2021
- "Reminder: Use FCA style guide and templates to improve communication," March 4, 2021
- "Best practices for naming files," Dec. 3, 2020
- "Take advantage of communication resources provided by OCPA," Dec. 3, 2020
- "Plain Writing Wednesday: Brush up on your grammar skills during quarantine," May 6, 2020

### **Training program**

Since starting the program in 2011, we have provided training in various ways. The following table shows training that has occurred since April 15, 2020.

**Table 2. FCA plain writing training, April 2020 – April 2021**

Type of Training	Number of Employees Trained	Date
<b>Online training for new employees.</b> 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. We have also posted the training on our Plain Writing SharePoint page for use by all employees.	49	April 15, 2020 – March 31, 2021
<b>Self-study curriculum.</b> Our Office of Examination rolled out its new self-study curriculum — POWER Writing I and 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.	62	Summer and fall 2020
<b>Webex session groups.</b> Our Office of Examination hired a plain writing specialist to provide interactive Webex sessions. He facilitated multiple small group sessions lasting 1.5 to 2 hours each where three to five examiners attended.	Approximately 155	Summer and fall 2020

### **Awards program**

To provide an incentive for employees to focus on clear communication, 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 (2020) was the eighth consecutive year that we presented plain writing awards. The winning documents have not yet been announced since the awards ceremony scheduled for December 2020 was postponed until employees return to work, which will be sometime later this year.

## **Clearance process**

Documents undergo plain language reviews within their originating offices. Our Office of Examination in particular 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.

For many of the documents that are posted on the FCA website, the editors in the Office of Congressional and Public Affairs perform comprehensive plain language reviews. To measure the effectiveness of these reviews, they sometimes run the StyleWriter application on documents before and after reviewing them, often seeing a significant improvement in the “bog index” after the review. (The bog index is a measure that StyleWriter uses to evaluate the readability of a document. It takes into account sentence length, word difficulty, the use of abbreviations, and passive verbs.)

The number of documents that receive comprehensive plain writing reviews has increased substantially in recent years. Last year, OCPA editors performed comprehensive reviews of more than a dozen [informational memorandums](#). They also reviewed and edited [privacy impact assessments](#) and other documents at the request of other FCA offices.

Clear communication has been particularly important this past year because of the pandemic. In addition to providing plain writing reviews for most of the guidance documents that were issued over the past 12 months, OCPA editors also provided plain language reviews for the messages that senior staff issued to staff.

## **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 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	We completed the redesign and upgrade of our website. In March 2019, the project won a website award from PR News.
In October 2018, FCA employees submitted 12 documents, or portions of documents, for consideration for the 2018 Plain Writing Award. Using StyleWriter statistics on each document and a checklist from plainlanguage.gov, the panel of judges selected two winning documents.	December 2018	In the agency's annual awards ceremony on Dec. 13, 2018, FCA board member Jeff Hall presented three co-authors of one document with the 2018 Plain Writing Award.
In October 2019, FCA employees submitted 13 documents, or portions of documents, for consideration for the 2019 Plain Writing Award. Using StyleWriter statistics on each document and a checklist from plainlanguage.gov, the panel of judges selected two winning documents.	December 2019	In the agency's annual awards ceremony on Dec. 12, FCA board member Jeff Hall presented the authors of two documents with the 2019 Plain Writing Award.
In October 2020, FCA employees submitted 14 documents, or portions of documents, for consideration for the 2020 Plain Writing Award. Using StyleWriter statistics on each document and a checklist from plainlanguage.gov, the panel of judges selected two winning documents.	December 2020	Since the agency's annual awards ceremony was postponed in December because of the pandemic, the awards have yet to be presented. We expect them to be presented at a ceremony when employees return to work in the office later this year.

## 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](http://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 Yaghmour, 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.