

Department of Health and Human Services Plain Writing Act Compliance Report April 2018

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On October 13, 2010, the Plain Writing Act (Act) was signed into law. The Act requires federal agencies to use "clear Government communication that the public can understand and use." Communications in plain language are especially important in the context of health care and human services. The Department of Health and Human Services (HHS) recognizes that using plain language can help address the needs of those with limited literacy skills, as well as those with limited health literacy skills. Plain language helps people understand health information because the writing style is clear, concise, organized, and jargon-free. Documents written in plain language are less complex and therefore easier for everyone to understand, including people who have limited literacy skills, limited health literacy skills, or both.

Overview

Since the last Department Plain Writing Compliance Report in April 2017, HHS has continued our efforts to implement the Act. HHS seeks to reach all Americans with useful health information they can easily understand. We remain committed to this goal by continuing to educate employees on the importance of plain writing, prioritizing plain writing training, and engaging the public on how we can improve our plain writing efforts. This report briefly describes HHS's plain writing activities across the following Operating and Staff Divisions:

- Administration for Children and Families (ACF)
- Administration for Community Living (ACL)
- Agency for Healthcare Research and Quality (AHRQ)
- 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)
- Centers for Disease Control and Prevention (CDC)
- Centers for Medicare and Medicaid Services (CMS)
- Office of the Chief Technology Officer (CTO)
- Departmental Appeals Board (DAB)
- Food and Drug Administration (FDA)
- Health Resources and Services Administration (HRSA)
- Intergovernmental External Affairs (IEA)
- Indian Health Service (IHS)
- National Institutes of Health (NIH)
- Office of the Assistant Secretary for Health (OASH)
- Office for Civil Rights (OCR)
- Office of Global Affairs (OGA)

- Office of the General Counsel (OGC)
- Office of the Inspector General (OIG)
- Office of Medicare Hearings and Appeals (OMHA)
- National Coordinator for Health Information Technology (ONC)
- Office of Security and Strategic Information (OSSI)
- Substance Abuse and Mental Health Services Administration (SAMHSA)

The Act requires each Department agency to designate one or more senior officials to oversee implementation of plain writing requirements. A list of such agency officials can be found on the HHS website here: https://www.hhs.gov/open/plain-writing/

Training

HHS carries out a wide array of training activities to ensure that our employees fully understand the importance of plain writing and how to do it effectively. While agencies are given the necessary flexibility to tailor their particular training programs for their individual needs, HHS does offer a Department-wide training—the *U.S. Department of Health and Human Services Plain Language Training*—that agencies can use. This basic plain writing training is accessed on the HHS Learning Management System (LMS) learning portal and the HHS intranet.

Most HHS divisions require employees to complete the LMS online training, but many agencies supplement this training with agency specific trainings. For example, NIH created an online plain language training that offers a number of tools for first-time users or employees seeking to brush up on their skills. In addition to the NIH online training, CDC offers three online options for basic plain language training to employees. In 2017, CDC identified 2,908 employees involved in creating or clearing public health and safety information of which 1,047 of them completed basic plain language training. An additional 465 staff (not full-time employees) were also trained.

In addition to online plain language trainings, some agencies offer a variety of in-person classes and training documents. For example, in the past year FDA hosted 17 two-hour plain language classes for 235 employees; HRSA created four plain language courses attended by 287 employees; CMS created several style guides and checklists to help staff integrate plain writing into their daily work; and DAB developed an online training called *Clarity and Conciseness in Business*, which 96% of DAB staff completed in 2017. Many agencies encourage the use of plain language for both internal and external communication. Such agencies also developed trainings and materials to educate stakeholders and the general public on plain writing. CDC developed four online health literacy courses for health professionals:

- Writing for the Public
- Using Numbers and Explaining Risk
- Creating Easier to Understand Lists, Charts, and Graphs
- Speaking with the Public.

These can be found here: http://www.cdc.gov/healthliteracy/gettraining.html

Reports, Documents, and Web Content,

To ensure that the information HHS provides is easily understood and useful, HHS is committed to regularly reviewing new and existing reports, documents, and web content for plain writing. In the past year, CDC wrote or revised 953 documents to meet plain language standards. Of those documents, 657 were new and 289 were substantially revised for plain language. Also, 139 of the 953 CDC documents were tested with the intended audience. OASH's *President's Council on Sports, Fitness, and Nutrition* developed several pages on its website, 15 blog posts, and five news articles/press releases in plain writing.

HRSA undertook multiple major website revamps in 2017, including revising over 100 grants-related public webpages to meet plain language standards. They also substantially reorganized and rewrote the National Health Service Corps website (over 200 documents) and ensured new webpages met plain language requirements. In addition, HRSA added a tool to their plain language website that enables the public and employees to submit documents and webpages that they think are unclear, jargon-filled, or difficult to understand, for review.

Last year, SAMHSA cleared more than 30 publications and 37 blog posts to meet plain writing standards. As part of its website modernization effort, *Project Evolve*, SAMHSA also converted more than 4,500 web pages into plain writing. The multi-year project required the consolidation of content from 100 websites to unify all agency information to <u>SAMHSA.gov</u>.

CMS worked diligently in the past year to substantially alter and improve through plain writing, several key documents and website content. *Understanding Your Eligibility Results* is a companion fact sheet to the Marketplace Eligibility Notice that CMS revised with plain language, and improved the layout to expand on information in the notice in a user-friendly way. Since the revised fact sheet was launched in November 2017, there have been fewer complaints and questions about the Marketplace Eligibility Notice on HealthCare.gov and the CMS call center. CMS also revamped the content on the employer coverage page on Medicare.gov which resulted in users more easily finding the information they needed as the number of pages viewed per session dropped from 11.3 to 8 pages.

Innovations

In the past year agencies across HHS have implemented innovative strategies to promote plain language writing among employees and stakeholders. For example, in October of 2017, all of FDA celebrated *Plain Writing Act and Health Literacy Month* with several promotions:

- An FDA-wide message was sent from senior staff promoting plain language awareness and training, with the release of the <u>Strategic Plan for Risk Communication and Health Literacy</u> on <u>FDA.gov</u>.
- The FDA intranet promoted plain language and health literacy awareness and training resources with a rotating web banner. These notices included daily FDA announcements for training resources, as well as external social media messages.
- The Plain Language Resource Center intranet site for employees was redesigned.
- FDA advertised the Virtual FDA University Plain Language webinars pilot for field staff.

HRSA also has an innovative program called *Office Hours* where staff can meet with the HRSA writing team and request assistance with current writing projects.

Several agencies established awards for plain writing or other incentives to encourage the use of plain language writing among employees. For example, CDC offers a plain language award and an excellence in communication award in their annual agency awards program. FDA includes a plain language award at the Commissioner's Honor Awards Ceremony to formally recognize FDA writers who succeed in making FDA documents easier to read. FDA also provides awards as the center level to staff for significant contributions to improving administrative, technical, or scientific communications.

In addition, many agencies include plain language writing in the position descriptions of employees and provide feedback during annual performance management reviews. For example, CDC Senior leadership and other supervisors reward staff who demonstrate and promote effective, clear communication and literacy skills through Performance Management Appraisal System (PMAS) ratings, public recognition in office meetings, time off awards, and special incentive awards.

Next Steps

As HHS continues to focus on plain writing in the coming year, agencies have specified ways in which they plan to improve or focus their efforts. CMS is in the midst of substantially revising and updating its plain writing training for 2018 to better reflect the communication challenges facing its staff, and an updated training will be implemented in 2018. CMS also plans to continue consumer outreach with plain language messaging through social media channels like Facebook, Twitter, and YouTube.

FDA is currently developing metrics for tracking the conversion of existing documents into plain writing. Their basic plain language skills and <u>Clear Communication Index</u> training is set for release on LMS in spring 2018. The FDA Office of Counterterrorism and Emerging Threats (OCET) is in the process of message testing with FDA's internal health care provider group on a continuing project to assess medical countermeasure-related messages among audiences with varying education levels. ASFR senior leadership also plans to encourage supervisors to add plain writing training to employee individual development plans where appropriate.

Conclusion

To achieve the best health outcomes, health decisions should be based on a clear understanding of relevant health information and services. There are many reasons why this often does not happen. Part of HHS's mission is to reach all Americans with health information they can easily understand and is useful. HHS's implementation of the Plain Writing Act continues to grow in scope and effectiveness with each year. Through persistent leadership, we will continue to cultivate a plain writing culture at HHS and strive to ensure that all new and existing documents,

reports, web content, and communication developed for the public, other government entities,
and employees, are written in plain language.