

U.S. Department of Health and Human Services Plain Writing Act Compliance Report April 2020

Background

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 writing are especially important in the context of healthcare and human services. The U.S. Department of Health and Human Services (HHS) recognizes that using plain writing can help address the needs of those with limited health literacy skills. Plain writing helps people understand health information better, because documents are less complex and more clear, concise, and jargon-free.

The Act requires agencies to write annual compliance reports and post these reports on its plain writing web page in April of each year. It also requires agencies to designate senior officials to oversee implementation of plain writing requirements. You can find links to HHS's senior officials, and to previous compliance reports, at: <u>http://www.hhs.gov/open/plain-writing/</u>.

The Department has amplified our efforts to implement the Act by engaging the public on how we can improve our plain writing efforts and prioritizing plain writing training for employees. HHS's 2020 compliance report demonstrates our continued compliance with the requirements of the Act. This report is organized in sections on Accomplishments, Best Practices, Innovations, and Continuous Improvements to highlight some of the major plain writing activities across the Department from March 2019 to March 2020.

Accomplishments

HHS has sought to reach all Americans with useful health information that they can easily understand. Over the past year, the Department has reviewed new and existing reports and web content for plain writing to ensure the largest impact on the public.

Major accomplishments across the Department included the Centers for Disease Control and Prevention's (CDC) e-mail to staff with a timely reminder, amid the Coronavirus outbreak, "Don't Forget to Use Plain Language During a Health Emergency!"



Additional accomplishments included the National Institutes of Health's (NIH) creation of the <u>All of Us Research Program</u> to collect and study data from one million or more people living in the United States. This year All of Us created engaging English and Spanish newsletter

templates with easy-to-read callout boxes and headers for quick scanning. The program also took complex science writing and distilled it to a 7th-grade reading level, providing their audience with relevant health research updates.

The Administration for Children and Families' (ACF) Office on Trafficking in Persons is committed to preventing human trafficking and ensuring that victims have access to services they need. The Office consolidated its <u>resource library</u> to increase plain writing effectiveness by reducing the number of pages from more than 100 to 33, archiving duplicate pages, and consolidating topics making resources easier to find.

The Centers for Medicare & Medicaid Service's (CMS) <u>Medicare & You</u> handbook explained Medicare benefits, and was mailed to more than 40 million beneficiary households. The handbook was substantively revised and updated through a rigorous review and clearance process that included plain writing consumer testing.

All of <u>Departmental Appeal Board's (DAB)</u> 9,500 documents were plainly written. Starting in 2019, DAB transitioned from PDF to HTML format for all Board decisions and decisions issued by Administrative Law Judges. This new and simplified format provided the public with decisions that were universally accessible. HTML documents are easier to read on computers and mobile devices, and more compatible with search engines.

The Food and Drug Administration's (FDA) Center for Tobacco Products developed a plainly written <u>"Youth e-Cigarette Prevention Infographic 2019"</u> to increase awareness of youth e-cigarette, also known as "vaping," prevention. In addition, in early 2020, FDA distributed <u>"The Real Cost"</u> campaign posters to all U.S. high schools, in plain writing, that resonated with the youth audience.

The Substance Abuse and Mental Health Services Administration's (SAMHSA) top three documents that had the largest public impact were written in plain writing. These included:

- 1. <u>Anger Management for Substance Use Disorder and Mental Health Clients: Participant</u> <u>Workbook</u>.
- 2. <u>Anger Management for Substance Abuse and Mental Health Clients: A Cognitive-Behavioral Therapy Manual.</u>
- 3. 2019 National Prevention Week Planning Guide and Resource Calendar.

The Assistant Secretary for Administration's (ASA) Office of Human Resource revised in plain writing the documents posted on the new <u>HHS Careers Website</u>. The website provided information on potential career opportunities at HHS and how to apply to those positions.

The Assistant Secretary for Financial Resources (ASFR) emphasized plain writing in grant announcements on the <u>Grants.gov</u> website. The site contains a series of short blogs with easily understood content on a variety of topics for the purpose of helping users quickly access needed information. The blog post <u>Two Ways to Save Your Grants.gov Search Queries</u>, for example, uses bullets with simple, easy-to-follow instructions along with screenshots.

Best Practices

HHS employed a variety of best practices to reinforce plain writing requirements, including senior officials promoting plain writing, and programs for tracking and measuring plain writing effectiveness. The following examples were a representative sample of best practices across HHS.

ACF performed an external 508-compliance review of all web-based materials. ACF also hired a Writer-Editor and Communication Specialist proficient in plain writing and 508-compliance requirements.

The Administration for Community Living (ACL) evaluated plain writing effectiveness of communications through audience feedback. For example, when an announcement published on ACL.gov, and was sent to e-mail subscribers, the public could send feedback to program staff directly and through online channels, such as social media or the <u>Contact Us</u> page on ACL.gov. Based on the public's feedback, the information was revised to improve clarity.

ASA's Program Support Center (PSC) web team tracked content using <u>Google Analytics</u> to monitor user experience, reviewed content for word difficulty to predict audience familiarity, and provided insights as to how the use of plain words may affect readability.

The Office for Civil Rights (OCR) used the <u>Fry Readability Test</u> to score its content. The grade reading level (or reading difficulty level) was calculated by the average number of sentences and syllables per hundred words. OCR's overall average scores for web content were at a 5th grade reading level.

Indian Health Service's (IHS) senior officials reinforced the principles of plain writing requirements by including a specific objective in the <u>IHS Strategic Plan</u>. Objective 3.1: "Improve communication within the organization with Tribes, Urban Indian Organizations, and other stakeholders, and with the general public."

FDA developed an e-mail mailbox for plain writing feedback. It also used the Federal Plain Language Guidelines as a resource for best practices related to plain writing. It also established agency-wide representatives to attend the monthly meetings of the <u>Plain Language Action and</u> <u>Information Network (PLAIN)</u>, participate in other *PLAIN* activities, and become members of the group's listserv.

Innovations

HHS used innovative tools to promote plain writing, including storytelling workshops, data collection systems, writing courses, employee awards and incentives, and plain writing skills included in job descriptions, performance management appraisal plans, and contracts.

ASFR developed an innovative strategy to promote plain writing through storytelling workshops. This specifically helped risk managers and financial information technology staff translate notable results and achievements into plain writing. ASFR hosted two internal

storytelling training sessions for more than 50 employees, and two featured talks during larger events reaching at least 625 attendees.

CDC used the <u>RedCap</u> system, referred to as the Health Literacy Reporting System, to collect data for a full year. This system standardized data collection on plain writing and health literacy initiatives. CDC's Office of Communication Science released <u>Pulse Check</u>, a communication concept testing system that provides rapid feedback on messaging materials prepared by CDC programs. It helped fine tune materials before programs conducted formal audience testing or disseminated the communication material.

The Office of the Inspector General (OIG) developed a writing course for auditors that included plain writing as a major emphasis.

The Office of Medicare Hearings and Appeals (OMHA) hired 500 staff and emphasized the importance of plain writing skills in position descriptions and in several job announcements for new attorney advisors and legal assistants.

The Office of the National Coordinator for Health Information Technology (ONC) included plain writing requirements in the quality assurance and surveillance plan under one of its contracts. This ensured that external documents for ONC grantees were published in plain writing.

SAMHSA included plain writing skills in many of the performance management appraisal plans of staff in the Office of Communications.

CDC's Office of Communication Science recognized efforts to advance plain writing by recruiting <u>Health Literacy Hero</u> nominees and selecting winners based on established award criteria.

HRSA recognized employees with plain writing expertise at an Annual Awards Ceremony and nominated staff for incentive awards to encourage the use of plain writing.

Two NIH documents received the ClearMark Awards from the Center for Plain Language:

- 1. <u>Breastfeed Your Baby to Reduce the Risk of SIDS</u> won the "Brochures up to 10 Pages" category.
- 2. <u>Don't Ignore Your Pelvic Floor</u> won the "Infographic" category.

Continuous Improvement

The Department carried out a wide array of training activities to ensure that employees fully understood the importance of plain writing and how to do it effectively. Many agencies encouraged the use of plain writing for both internal and external communication.

The Agency for Healthcare Quality and Research (AHRQ) directed all staff to take the NIH Plain Language Training, and required all new communications staff to take plain writing training. In addition, some AHRQ staff took relevant training via LinkedIn Learning.

ACF purchased WordRake editing software for all Office of Child Support Enhancement writers to help develop clear and concise information for the public. WordRake reviewed all content and provided suggestions for improving the readability of the information.

ACL provided both one-on-one workshop-style training to all staff, and the feedback was overwhelmingly positive. There was no limit on the number of times staff can take the training, which was focused on improving actual products that participants created.

ASFR trained 50 employees on the use of plain writing in drafting a simple e-mail to complex technical documents.

The Office of the Assistant Secretary for Preparedness and Response (ASPR) encouraged all employees who write, edit, or clear documents to take the Plain Writing Act online training on the HHS Learning Management System. This included all Office Directors and their support staff.

CDC trained 705 employees on plain writing and emphasized the need for on-going training.

CMS substantially revised and updated the CMS Plain Writing training on the HHS Learning Management System to better reflect the communication challenges facing CMS staff. This updated Plain Writing Training included a more interactive interface with examples and exercises relevant to CMS work.

DAB's plain writing specialist developed and implemented a training program that required all DAB staff to watch a series of 16 short videos developed by the University of Maryland, Baltimore Writing Center titled <u>How to Revise and Self-edit</u>. Approximately 90% of DAB staff (69 out of 76 employees) completed the required training.

FDA's Center for Biologics and Evaluation (CBER) trained all 253 employees on plain writing. FDA's National Center for Toxicological Research trained 60 of its researchers on several plain writing training sessions. FDA's Office of Policy, Planning, Legislation, and Analysis developed and implemented the FDA Basic Plain Language Skills and Clear Communication Index (CCI) Training to teach FDA employees how to use the CCI, and encouraged its use to check communications for plain writing throughout the agency.

HRSA trained 170 employees on plain writing. HRSA's Writing Curriculum comprised of three core courses that addressed plain writing standards. These included:

- 1. Foundations in Professional Writing.
- 2. Plain Writing for the Federal Workforce.
- 3. Advanced Professional and Technical Writing.

IHS developed an IHS <u>Introduction to Health Literacy</u> training program focusing on plain writing and health literacy for employees to access on the HHS Learning Management System. Tribal and urban Indian Health employees accessed and completed the training. In addition, IHS provided presentations and webinars on plain writing and health literacy with more than 200 attendees.

OIG trained 30 employees on plain writing through an in-house training. In addition, OIG sent seven staff to the Council of Inspector General for Integrity and Efficient (CIGIE) courses, "Planning, Organizing, and Writing Effective Reports - POWER" and "Coaching Effective Writing".

OMHA trained 380 staff through the Plain Writing Training on the HHS Learning Management System.

NIH's National Institute for General Medical Services trained staff on the effective use of plain writing by offering a yearly training by the <u>Alan Alda Center for Communicating Science</u>. The trainer held two 90-minute sessions.

ONC offered the following plain writing sessions: Writing for Results--this course focused on writing to convince readers and achieve real-world results using plain writing; and Clear Writing Through Critical Thinking--this course sought to improve the thought process at each stage of the writing process by infusing plain writing with critical thinking.

SAMHSA designed and developed a SAMHSA-Based Plain Writing Training on the HHS Learning Management System to provide a plain writing training specific to SAMHSA employees.

Conclusion

HHS's implementation of the Plain Writing Act has grown in scope and effectiveness with each year. Through persistent leadership, we have cultivated a plain writing culture, ensuring all new and existing documents and web content for the public, other government entities, and HHS employees are written in plain writing. If you have questions or feedback about this report, please contact the HHS Executive Secretariat at HHSExecSec@hhs.gov.