A Study of the Plain Writing Act of 2010:
Federal Agency, Writer, and User Appropriations of U.S. Plain Language Policy

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ABSTRACT

On October 13, 2010, President Barack Obama signed the Plain Writing Act of 2010 into law. It requires federal government agencies to use plain writing in all "covered" documents "the agency issues or substantially revises" (Sec. 4 (b)). The goal of the Plain Writing Act is to "enhance citizen access to Government information" (Introduction) and improve government operations and accountability "by promoting clear Government communication the public can understand and use (Sec. 2). This dissertation examines what plain language, as the Act defines it and the U.S. federal government (USG) is implementing it, means and does at the various levels of language policy—institutional, writer, and user.

I argue that "real" plain language policy differs from the policy documented by the Plain Writing Act of 2010. While plain bureaucratic writing can help to make government documents more understandable for users, plain writing alone cannot achieve the Act's goals. Plain writing is a *style* of writing. As such, it is not only contingent, but it is also subjective and based on preference, which is impossible to legislate. Hence, plain bureaucratic writing is and does different things at different levels of language policy. Moreover, institutional- and writer-level representations of plain bureaucratic writing are at odds with user representations in many respects. Plain bureaucratic writing for USG agencies and federal writers is another way to describe good writing in the tradition of Edited American English and "fixes" the problem of bad government writing. At the user

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level, understandable writing is plain writing, regardless of whether it adheres to the principles of standard written English or the plain style. Plain language legislation does not affect the work of most writers in the study or their ability to do it. Nonetheless, user participants generally prefer plain language, reporting that they are more inclined to do what a government document intends for them to do when they understand it. Efforts to enhance government communication should focus on usability instead of plain language since usability is a better measure of the extent to which plain bureaucratic writing impacts the textual government-citizen interaction.

Dedication

I dedicate this dissertation to Donald Williams, former drama instructor at Coastal Carolina Community College in Jacksonville, North Carolina. It has been 28 years since you helped me—a young mother, struggling to make ends meet—find the resources I needed to continue my studies. That small kindness has taken me a very long way. I cannot thank you enough.

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Introduction: Plain Writing as Language Policy

"Are you a veteran who was separated from the armed forces under honorable conditions after completing an initial continuous tour of duty of at least 3 years (may have been released just short of 3 years" (*USAjobs.gov*)?

Background

On October 13, 2010, President Barack Obama signed the Plain Writing Act of 2010 (Act or PWA) into law after the 111th Congress passed it by an overwhelming majority.[1] Sponsored by Representative Bruce Braley (D-IA), the Act aims to "enhance citizen access to Government information and services by establishing that Government documents issued to the public must be written clearly" (Introduction). Its stated purpose is to "improve the effectiveness and accountability of Federal agencies to the public by promoting clear Government communication that the public can understand and use" (Sec. 2). The Act defines plain writing as "writing that is clear, concise, well-organized, and follows other best practices appropriate to the subject or field and intended audience" (Sec. 3 (3)). It requires federal government agencies[2] to "use plain writing in every covered document of the agency that the agency issues or substantially revises" (Sec. 4 (b)). This approach to communication emphasizes an attention to correctness, clarity, and medium that helps to ensure appropriateness to purpose and audience. In theory, the plain language document is designed specifically for readers (Kimble, *Writing for Dollars* 16-17), uses language they can easily understand (*Plainlanguage.gov*), and is organized to help them complete necessary tasks (*Centerforplainlanguage.org*).[3] From start to finish, plain language, as mandated by the Act, is centered on the user's needs.

I first learned of the Plain Writing Act in April 2012, when I happened across Lisa Rein's "Advocates of the Plain Writing Act prod federal agencies to keep it simple" in the *Washington*

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Post. The deadline for agencies' initial compliance reports—a requirement of the Act—was approaching, and various commentators were discussing the U.S. Government's (USG) implementation of the Act. Some comments in the article highlight problems with the Act, including challenges related to specialized language that cannot be simplified, the lack of detailed guidance, and the fact that the implementation of plain language in federal agencies is an unfunded mandate. Annetta Cheek, however, offers a different perspective. A former federal employee, one of the founders of the nonprofit Center for Plain Language, and a longtime plain language activist, Cheek played a key role in the Clinton-Gore administration's plain language efforts (Cheek, "The Plain Regulations Act" 41). Cheek points out in the Rein's article that "Government is all about telling people what to do," adding, "If you don't write clearly, they're not going to do it." Cheek's statement encapsulates the goal of this dissertation research: to understand whether and how plain language, as forwarded by the Plain Writing Act of 2010, affects the USG's work of "telling people what to do" and what this plain bureaucratic language means for the public.

As I will show in Chapter 1, there have been many calls for plain language throughout history, including within the USG. Some plain language initiatives have taken the form of language management, which Bernard Spolsky describes as "direct efforts to manipulate the language situation" (*Language Policy* Loc. 259).[4] Since 1978, for example, New York has required that all consumer transactions be "[w]ritten in a clear and coherent manner using words with common and everyday meanings" (Tiersma, N.Y. General Obligations Law § 5-702 (1)). Connecticut law also requires plain language in consumer contracts, outlining specific criteria for determining whether a document meets the plain language test, as indicated in Table I-1 below.

SR=Survey Respondent   FG=Focus Group Participant
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Table I-1. Tests for Plain Language in Connecticut Consumer Contracts	
(b) Plain language tests. A consumer contract is written in plain language if it substantially complies with all of the following tests: (1) It uses short sentences and paragraphs; and (2) It uses everyday words; and (3) It uses personal pronouns, the actual or shortened names of the parties to the contract, or both, when referring to those parties; and (4) It uses simple and active verb forms; and (5) It uses type of readable size; and (6) It uses ink which contrasts with the paper; and (7) It heads sections and other subdivisions with captions which are in boldface type or which otherwise stand out significantly from the text; and (8) It uses layout and spacing which separate the paragraphs and sections of the contract from each other and from the borders of the paper; and (9) It is written and organized in a clear and coherent manner.	(c) Alternate objective tests. A consumer contract is also written in plain language if it fully meets all of the following tests, using the procedures described in section 42-158: (1) The average number of words per sentence is less than twenty-two; and (2) No sentence in the contract exceeds fifty words; and (3) The average number of words per paragraph is less than seventy-five; and (4) No paragraph in the contract exceeds one hundred fifty words; and (5) The average number of syllables per word is less than 1.55; and (6) It uses personal pronouns, the actual or shortened names of the parties to the contract, or both, when referring to those parties; and (7) It uses no type face of less than eight points in size; and (8) It allows at least three-sixteenths of an inch of blank space between each paragraph and section; and (9) It allows at least one-half of an inch of blank space at all borders of each page; and (10) If the contract is printed, each section is captioned in boldface type at least ten points in size. If the contract is typewritten, each section is captioned and the captions are underlined; and (11) It uses an average length of line of no more than sixty-five characters.
Source: Tiersma, Conn. Gen. Stat. § 42-152	

However, the Plain Writing Act of 2010 is the first explicit plain language mandate to be legislated at the federal level in the United States. In other words, the Act is *about* plain language. This legislation can be attributed, in no small part, to the efforts of Cheek and her colleagues at the Center for Plain Language. They drafted versions of the law, found sponsors, and were active in the legislative process from beginning to end (Cheek, "The Plain Writing Act

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of 2010" 53). But while plain language is now the law for federal agencies, there is still relatively little research by writing studies scholars that examines what plain language legislation means for federal writers and the people who read texts produced by the USG. Hence, when President Obama signed the Plain Writing Act into law, he instituted a language policy about which there are still many unanswered questions.

As both a former federal employee with more than 18 years of service and a writing studies scholar, I could not help but wonder how, from a practical perspective, the USG could accomplish the Act's requirement that federal government agencies "use plain writing in every covered document of the agency that the agency issues or substantially revises" (Sec. 4 (b)). After all, scholars and practitioners alike have long contemplated what constitutes the clear, concise, and well-organized writing the Act and its implementing guidance mandate. Additionally, USG agencies generally have their own, often very distinct, communication styles and approaches that have developed in response to many and complex drivers. For example, the use of jargon and technical terms is often specific to the organization, function, or both. *Tort*, *complaint*, *filing*, and *case* are all part of the Department of Justice's lexicon and used in particular ways, while *demarche*, *interlocutor*, and *reciprocity* routinely appear in State Department communications. The U.S. Census Bureau makes a point of using language that is accessible to the public (*2013 Compliance Report* 1), while the Department of Defense is infamous for using "military speak" that is, at best, hard to understand for those who are not familiar with its culture. Given these factors, it seems unlikely that the federal workforce implementing the provisions of the Plain Writing Act would have any better grasp of what constitutes clarity, conciseness, and good organization than do writing studies scholars.

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At the same time, college-educated, middle-class employees comprise the bulk of the federal workforce. Table I-2 below summarizes these characteristics:

Table I-2. Federal Workforce Statistics by Percentage	
Gender	Female: 43.19
	Male 56.81
Education	No Post-Secondary Education: 27.52
	Post-Secondary Education: 72.38
Median Salary	$69,550
Occupational Category*	White Collar: 90.06
	Blue Collar: 9.8
* 01 percent in unspecified occupational category	
Source: Wiesman and Arenberg 24-27	

On the other hand, consider the characteristics of the broader U.S. population for which this largely white-collar, college-educated federal workforce writes:

- Almost 20 percent of U.S residents over the age of five speak a language other than English at home (U.S. Census Bureau, *Statistical Abstract of the United States: 2012* 50).

- Almost 13 percent of U.S. residents are foreign born (Grieco et al. 2).

- Almost 28 percent of the U.S. population in 2010 identified as a race other than White, and approximately 16 percent identified as Hispanic or Latino (Humes et al. 4).

- More than 87 percent of people over the age of 25 have completed high school or higher (*Digest of Education Statistics*, "2012 Tables and Figures" Table 8).

- Less than 31 percent of people over the age of 25 have a bachelor's degree or higher (*Digest of Education Statistics*, "2012 Tables and Figures" Table 8).

- Approximately 14 percent of people over the age of 16 in 2003 were in the "below basic" literacy category, meaning they had "no more than the most simple and concrete literacy skills" (National Assessment of Adult Literacy).

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These data highlight two important considerations related to the implementation of the Plain Writing Act of 2010. First, the public for which the Act aims to make information more accessible, understandable, and usable is diverse in many respects; therefore, it cannot be understood as a linguistically homogenous public. Second, given this linguistic diversity, it is unrealistic to expect the public to have a single view of what constitutes plain language. Thus, how can federal writers know which variation of clear, concise, and well-organized writing represents best writing practices—or for whom?

The Study: Framing the Research Questions

David Cassels Johnson defines language policy as a "policy mechanism that impacts the structure, function, use, or acquisition of language" (Loc. 402). Harold Schiffman distinguishes between language policy that is "explicit, formalized, *de jure*, codified, [and] manifest" and language policy that is "implicit, informal, unstated, *de facto*, grassroots, [and] latent" (13). So while the Plain Writing Act is a formal, explicit language policy, edited American English (EAE), for example, is implicit language policy insofar as it is considered the standard for good, correct, acceptable, etc., writing, including in the bureaucratic context. Cassels Johnson points out that in addition to explicit and implicit policy, language policy also includes processes and "[p]olicy texts and discourses across multiple contexts and layers of policy activity" (Loc. 410). In this sense, the USG's plain language policy extends beyond its formalization in law. It also comprises the beliefs and priorities of language policy agents and arbiters,[5] who Cassels Johnson says may "appropriate" and implement the policy based on their own language beliefs (Loc. 379). Additionally, plain language policy in this framework both reflects and shapes the context in which it is created, appropriated, and implemented, context that includes policy-related processes, plain language discourses, and the language beliefs and practices of policy makers,

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arbiters, implementers, and users. Thus, the Plain Writing Act of 2010 is more than the law, the Office of Management and Budget guidance for how it is to be implemented, and the plain writing compliance reports in which agencies document their plain language-related efforts. It is also the processes and products associated with the Act's implementation, the various representations of plain language, and the language practices affecting, affected by, and resistant to this policy.

Elana Shohamy (Loc. 1478) argues that any useful study of language policy requires the researcher to consider both explicit and implicit policy. Such research should consider not only official language policy texts and the objectives they articulate, but it should also examine how the policy is appropriated by arbiters and implementers and reflected in (or resisted by) local language practices. Hence, my research goals were to gain a better understanding of plain language representations at the macro (federal agency), meso (federal writer), and micro (user) levels. I wanted to understand how USG agencies forward the provisions of the Plain Writing Act of 2010 as well as whether and how the Act impacts those who are tasked with its implementation and those it is intended to benefit (audiences for federal government documents). Specifically, I wanted to know how federal writers and users of USG texts understand plain language as well as how they believe plain language should and does impact the accessibility, understandability, and usability of official documents. I also wanted to know how producers of USG documents appropriate plain language vis-à-vis the Plain Writing Act to, as Cheek puts it, "tell people what to do" and the extent to which users are inclined to do what the USG tells them to do in its plain language texts. Thus, I designed the study around the following research questions:

1. What is plain language in the bureaucratic context, and for whom?

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2. How does pain language legislation affect the work of the USG, specifically, federal

    writers?

3. Does plain bureaucratic language influence how users respond to USG texts?

My thesis is that the Plain Writing Act of 2010 is impracticable because, in addition to being

contingent (audience and subject specific), plain is a subjective quality and cannot be

consistently defined or, therefore, meaningfully measured. Plain bureaucratic writing inevitably

means and does different things at different levels of language policy, sometimes in ways that are

inconsistent with the Act's objectives. Furthermore, while there is research that shows plain

writing techniques facilitate the user's ability to read and comprehend a text, many other

factors—linguistic and non-linguistic alike—determine the extent to which a document is

accessible, understandable, and usable. Finally, I argue that efforts to enhance government

communication should focus on usability instead of on plain language since usability is a better

measure of the extent to which plain bureaucratic writing impacts the textual government-citizen

interaction.

Plain Language Research in Plain Language: No Easy Task

I attempt in this dissertation—more successfully in some chapters than in others—to follow

plain language guidelines, specifically, the *Federal Plain Language Guidelines*. What I

discovered is that, in some instances, the plain style helps me to convey information clearly and

concisely. There are times, however, when plain writing results in more, not less, text. For

example, I write out the names of the federal agencies I reference rather than use acronyms

because I assume acronyms (and so many of them) will confuse my readers. Doing so, however,

not only lengthens the text, but it also makes it downright clunky in places. There were also

times during the drafting process when I was simply at a loss to express something plainly when

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a very specific, albeit technical or complex, word conveys the meaning precisely. And I found

that even the plainest language can be confusing, therefore, unusable.

The epigraph above is drawn from the USG's employment website. The language is quite

simple. The text is in question format, which many plain language experts recommend (See

Gillespie Myers, *Banishing Bureaucratese* 79, for example). Respondents have the option of

selecting "Yes" or "No" in response to the question. However, for a veteran who was honorably

discharged but did not serve for three continuous years (or slightly less than three years), this

question is impossible to answer correctly. To say "Yes" means the veteran is saying he or she

was honorably discharged (true) after three continuous years of service (false). To say "No"

means the veteran is saying he or she was not honorably discharged (false) after three continuous

years of service (true). As is the case with the epigraphs at the beginning of each of the following

chapters, this example illustrates that plain language does not always solve or prevent problems

with accessibility, understandability, and usability. Despite being in plain language, this text does

not accommodate exceptions, a medical discharge after two years of service, for example,

thereby making it unusable for those veterans whose circumstances fall outside the norm. These

epigraphs all show, in various ways, that plain language as the remedy for complicated,

inaccessible, or unusable writing is not always a foregone conclusion or even the best approach.

Document Organization

This dissertation is organized into six chapters. The first chapter is a review of plain language

literature. Here I introduce plain language, detailing its definitions, benefits, challenges, and

history. I describe my methods in Chapter 2, explaining how I conducted the interviews, focus

groups, and textual analysis from which I draw my conclusions. Chapters 3, 4, and 5 are analyses

of the study data: user participant input, writer participant input, and the 2013 Plain Writing Act

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compliance reports. Finally, Chapter 6 synthesizes the study data and analyses contained in the previous chapters in order to answer the research questions and develop the study findings.

I begin with a question that I will come back to in Chapter 6: "How can anyone be against stuff being clearly written?" (WI-1). To be sure, as Chapter 1 will show and this research reinforces, plain language has demonstrable value, and the costs of unclear, unusable government communications are high—for the users who rely on official texts as well as for the USG. However, plain language's value does not translate into effective plain language policy by way of the Plain Writing Act of 2010, in no small part because there is much more to "stuff being clearly written" than bulleted points, contractions, or proper punctuation. This research attends to these other factors and, in the process, interrogates assumptions about plain language's relationship to accessibility, understandability, and usability in the bureaucratic context.

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Chapter 1. Plain Language: The Literature

"Maybe it was just his glabrous head, but Cheney always exuded, and continues to exude, a surly gravitas that the peevish Bush never mastered" (Caryl 66).

Glabrous: smooth, hairless, bald.

1.1 Introduction

The Plain Writing Act of 2010 focuses specifically on writing generated by the USG's bureaucracy; however, the push for plain language extends broadly to institutions and individuals in other sectors and geographic locations. To varying degrees of success, plain language initiatives exist in state and local government organizations in Arizona, California, Florida, Minnesota, New Jersey, New York, Oregon, and Washington; in companies such as Aetna, Allen-Bradley, Citibank, Federal Express, General Electric, Siegel+Gale, and WellPoint; and in Australia, Canada, the European Union, Finland, New Zealand, Norway, Pakistan, Portugal, South Africa, Sweden, and the United Kingdom (UK), among others. Around the globe and in a wide range of industries, the plain language movement has gained momentum and enjoyed increased visibility as a result of the activism of such organizations as Clarity, Scribes, the Plain Language Association International, the Center for Plain Language, the Plain Language Center, the Plain English Campaign, and the USG's Plain Language Action and Information Network (PLAIN). There are journals dedicated to plain language (*Clarity*, *Scribes*), national and international conferences that focus on plain language, and consultancies that specialize in readability, usability, and plain language.

Despite the inroads this movement continues to make, writing studies scholars have paid comparatively little attention to it and even less to the Plain Writing Act. It is unclear what plain

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writing in the bureaucratic context is and does—or for whom. This dissertation responds to the

lack of research on the Plain Writing Act of 2010, and a survey of plain language literature helps

to situate the analysis, showing why such research is important. This chapter outlines the history

of plain language, examining how it is defined as well as what constitutes its best practices and

principles. It also discusses the benefits and limitations commentators typically associate with

plain language, along with challenges to plain language-related claims.

1.2   First Things First: Defining Plain Language

Plain language does not have a single, straightforward, internationally agreed-upon

definition. There are differences in the terminology used to talk about the movement; disparate

understandings of what such words as *plain*, *clear*, and *easy* mean; and even some disagreement

about the features of plain language. Plain writing commentators sometimes fail to distinguish

between plain language and plain English, using these terms interchangeably, and the lines can

be quite blurred when it comes to their use in the context of plain writing. For example, one of

the federal writers who participated in the study spoke at length about what plain language looks

like and how it is defined. A partner in a private law firm before entering government service, he

uses plain English and plain writing indiscriminately (See Chapter 4 for a detailed discussion of

writer participant comments). In "The Plain English Movement's Shifting Goals," however, Kali

Jensen differentiates between the plain English movement, which, as the name suggests, relates

to written and spoken English, and the plain language movement, which is not language specific

(816). Although plain language initiatives in languages other than English certainly offer useful

insights about the movement generally, its benefits, and its challenges, their analysis is beyond

the scope of this project. In this dissertation, I use plain writing and plain language

interchangeably, unless otherwise noted, and assume an English-only context. Any use of the

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term plain English reflects the language of specific commentators, interviewees, focus group participants, or survey respondents.

Just as the terms plain language, plain English, and plain writing are often conflated and sometimes used in confusing ways, definitions of plain language are opaque at best. Many commentators describe plain language rather than define it. In *Writing for Dollars Writing to Please*, Thomas M. Cooley Law School Professor Joseph Kimble, a leading U.S. plain language advocate, describes plain writing in terms of its "guidelines" instead of providing an explicit definition. Kimble and other plain writing experts generally agree that there are no specific rules for plain writing, but their guidelines-based approach sets out the ideal qualities of plain language, as outlined in Table 1-1 below. This guidelines-based approach, however, is not supported by a commonly agreed-upon definition of plain language, an absence that some commentators view as a problem (Mazur, Piper, Stark). British plain language activist Martin Cutts concedes that plain English is a "woolly term," suggesting it is "[t]he writing and setting out of essential information in a way that gives a co-operative, motivated person a good chance of understanding the document at first reading, and in the same sense that the writer meant it to be understood" (3). PLAIN takes up a similar definition: "Plain language (also called Plain English) is communication your audience can understand the first time they read or hear it" (*Plainlanguage.gov*). For these commentators, plain writing effectively conveys the writer's intent, assumes a literate audience, uses language this audience can read without too much effort, and, therefore, is understandable.

Many of the federal writers who participated in the research study on which this dissertation is based also define plain language in ways that assume a link between understandability and readability. "It's material that your intended audience can understand in one reading" (WI-1).

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"It's English prose that's written to maximize the understandability of what the writer has to say in the most direct way and in the fewest number of words while maintaining clarity" (WI-3). "It is writing that the intended reader can understand the first time he/she reads the document and comprehend its intended meaning and message" (SR-6). Plain language consultant Martijn Jacobs makes a similar connection, claiming, "[A] letter is clear if the reader learns what they need to know from it within 15 seconds" (41). Each of these representations suggests plain language—everyday words, short sentences, and active voice—as a means to bridge authorial intent and reader comprehension by way of readability. Plain language features facilitate readability, therefore, understandability. Hence, the reader is able to understand a plain language text as the writer intended for it to be understood.

Other definitions extend plain language beyond readability and understandability. Former South African Minister of Justice Dullah Omar, for example, calls plain language "democratising language" (qtd. in Burt 5). In this sense, plain language is accessible language; it gives readers access to information that other language forms may not. Similarly, the Office of Personnel Management says plain language is "grammatically correct and universally understood language that includes complete sentence structure and accurate word usage" (*OPM.gov*). To be plain writing in this articulation, a text must be grammatically correct, properly punctuated, and written according to a common standard of usage. Doing so ensures that all readers can understand the document. Cheryl Stephens, co-founder of the Plain Language Association International, agrees that plain language is understandable communication, but she argues that plain language is not a style; rather, it is a process, a means to an end ("An Introduction" n. pag.). The end is a communication that the intended audience can understand and use in the way the writer (or speaker) meant for it to be understood and used.

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Cheek acknowledges that there are various definitions of plain language in *Clarity*'s

November 2010 issue. She categorizes these definitions as numerical- or formula-based,

elements-focused, or outcomes-focused, pointing out that all three help to determine if a text is

clear and in plain language (5). She offers the following definition: "A communication is plain

language if it meets the needs of its audience—by using language, structure, and design so

clearly and effectively that the audience has the best possible chance of readily finding what they

need, understanding it, and using it" (5). Here, Cheek highlights the centrality of audience to the

understandability and readability of plain language texts, and Stephens agrees that it is the

audience that determines whether a communication is plain ("An Introduction" n. pag.). The

reader's ability to understand the writer's intended meaning determines the extent to which a text

can be considered plain or clear, and the proof is in how the information is used.

Like Cheek and Stephens, most commentators highlight the importance of audience in their

representations of plain writing. This emphasis on audience in definitions of plain language is

typically expressed as some combination of accessibility, readability, and usability. As Karen

Schriver puts it, plain language is more than simply constructing appropriate visual and verbal

messages; it is about connecting with stakeholders and contextualizing in a way that makes the

value of a text clear (Plain 2013 Presentation). From Cutts's perspective, plain writing means

"pitching the language at a level of sophistication that suits the readers and using appropriate

structure and layout to help them navigate through the document" (3). Former professor of

business communication Edward Bailey offers a simpler approach, arguing that the key to plain

English is to talk to the reader: "Simply talk on paper: write the way you talk" (10). However,

plain English is not an absolute, cautions Cutts; what is plain to one audience may completely

confuse another (4), a point PLAIN also makes in its definition of plain language

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(*Plainlanguage.gov*). The Center for Plain Language also notes that what is considered plain varies by audience: plain language for one audience in one context may not be plain for another audience or in a different context (*Centerforplainlanguage.org*). In her February 26, 2008, testimony to the House of Representatives Committee on Small Business about what was then entitled the Plain Language in Government Communications Act of 2007, Cheek emphasized both the contingent nature of plain language and the centrality of audience: "The only hard rule is to be clear to your audience. Everything else is technique."

1.3 The Elements: Plain Writing Guidelines

The techniques to which Cheek referred are the tenets of plain writing—the guidelines Kimble, the Center for Plain Language, and countless other plain language experts and organizations advocate. They also appear in the Office of Management and Budget's implementing guidance for the Plain Writing Act, the *Federal Plain Language Guidelines*, and most plain language manuals and handbooks. Guidelines include eliminating surplus words; using verbs rather than nominalizations; replacing long, complex sentences with short, simple ones; choosing everyday words; formatting clearly; using personal pronouns, contractions, and a variety of correct punctuation; and avoiding repetition, legalese, jargon, and excessively formal language (See Bailey, Gillespie Myers, or the *House Legislative Counsel's Manual on Drafting Style*, for example). Kimble points to the need for paying close attention to document design, organizing a document to ensure that the main point is at the beginning, and avoiding passive verb construction (*Writing for Dollars* 7). Cutts also views plain English as guidelines-based writing rather than as rules-based writing (3). His guidelines for plain language are similar to Kimble's and mirror as well the elements the Center for Plain Language says characterize plain writing: the use of active voice, everyday words, short sentences and paragraphs, bulleted lists,

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headings, and correct punctuation (*Centerforplainwriting.org*). Thus, while there is variation in how commentators define plain language, there is consistency in how they describe it.

In addition to the language features that characterize plain language, some commentators point to the important role of usability. The Center for Plain Language emphasizes usability testing as a component of plain writing (*Centerforplainlanguage.org*), and many plain language experts agree it is necessary for creating reader-focused documents (See Banoff and Lipton or Lauchman, for example). Additionally, plain language guidelines typically indicate the need for writers to consider how well the layout of a document works for the audience (Redish, Schriver) and the importance of easy-to-read design features (Fisk, Jacobs). Plain language guidelines extend to how information is organized within a document as well. Experts encourage writers to order their texts logically (Kimble 7, Stephens 70), include the main point at the beginning of the sentence or document (*Federal Plain Language Guidelines* 56), get right to the bottom line (Bailey 26), and consider the role organization plays with respect to information's accessibility (Cutts Loc. 176). Plain language's bottom line is that the writer must focus on the reader's needs, and the guidelines commonly associated with this type of writing are supposed to help ensure that a communication is "clear, concise, and well-organized" (PL 111-274, Sec. 3 (3)) such that the reader can easily read, understand, and use a text.

Table 1-1 below lists the characteristics typically associated with plain writing—although not all plain language experts agree on all the guidelines. For example, Stephens cautions that the use of contractions may make reading more difficult for some individuals (*Plain Language in Plain English* 103). Schriver also notes that research is "iffy" about what the use of contractions affords (2012 Clarity Presentation). Most plain language experts, however, encourage the use of contractions as a way to make a text more accessible (See Bailey, Gillespie Myers, or Kimble,

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for example). Schriver points out that empirical research suggests some plain language practices do, in fact, make texts easier to read and understand, for example, the use of short sentences, common words, and personal pronouns in legal writing (2012 Clarity Presentation). But she also says new research complicates some long-held notions about what facilitates reading and comprehension, such as the idea that serif faces are easier to read than sans serif faces. According to Schriver, research now shows that sans serif and serif are equally easy to read on high-resolution displays and other factors, including contrast and line length, are equally important to consider (PLAIN 2013 Presentation).

Table 1-1. Plain Language Guidelines	
Emphasis	**Plain Language Guidelines**
Audience	• Know the Audience • Determine Audience Needs • Identify Outcomes • Consider What/How to Say/Write to Achieve Outcomes • Reader Oriented • Appropriate to Audience (voice)
Organization and Document Design	• Purpose First • Main Point at Beginning • Bulleted Lists • Tables • Information Easy to Find • Background Information Last • Headings • Short Paragraphs with One Topic
Style, Usage, and Punctuation	• Short Sentences • Simple, Everyday Words • No Jargon; Clear • Active Voice • Personal Pronouns • Use of Verbs • Correct Punctuation • Contractions
Readability and Usability	• Usable • Tested • Written for Web

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1.4 Why Legislate Plain Language?

British linguist David Crystal credits institutions such as the federal government with "enormous linguistic power" (Loc. 2214). Whether directly, such as in the form of English-only or bilingual education laws, or indirectly, such as through educational policies that privilege standardized English, the USG has promoted some language practices while discouraging others (Brice Heath 56, Cassels Johnson Loc.628). There are many reasons for interventions in language practices, including non-linguistic factors (Spolsky, *Language Policy* Loc. 222, Shohamy Loc. 1530). For Tim Machan, broader cultural and social concerns are at the root of the "language anxiety" that drives such attempts to manage language practices (*Language Anxieties* 3). In Machan's view, language policies that, for example, proscribe certain words or prefer one term over another are actually attempts to "fashion a particular form of the present" (*What is English?* 82). Such "lexical engineering" as eliminating jargon, says Machan, is used as a form of social management (*What is English?* 77). In this sense, initiatives like the Plain Writing Act of 2010 represent an "attempt to repackage reality . . . and thereby allow for greater procedural transparency" (*What is English?* 77). Shohamy, on the other hand, argues that language laws turn ideology—language beliefs—into practice and those in authority, e.g., government and elected officials, have better access to the mechanisms (e.g., policymaking) for managing language policy than does the rest of the population (Loc. 1563-1597). For Shohamy, language policy tends to reflect the language beliefs and practices of those who have access to or are members of the institutions with "enormous linguistic power."

According to Cheek, however, the reason for legislating the use of plain language in USG documents is benign: to get the government to communicate more clearly (Clarity 2010 Presentation). She points out in her discussion of the pending Plain Regulations Act that plain

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language is a "moral imperative"; citizens have the right to understand government communications ("The Plain Regulations Act" 41). For his part, Braley notes that clear government communications not only support greater transparency and accountability, but they also can save the public time and money (17 March 2010 Press Release). In the "Why Plain Language?" section on its website, PLAIN, the USG's official interagency working group on plain language, also points to time and cost savings, noting as well that plain language promotes better service to the public (*Plainlanguage.gov*). Additionally the Office of Management and Budget says in its implementing guidance for the Act that plain writing is "indispensible" to the administration's goals of "transparency, public participation, and collaboration" (1). These statements represent plain language as a way to protect the public's interests and the Plain Writing Act as the mechanism for ensuring its use across the USG. Thus, this legislation codifies a federal plain language agenda that, in theory, works to the advantage of both the government and the public.

1.5   The Benefits of Plain Language

In his remarks during the opening ceremony of Clarity International's third international conference in 2006, Kimble listed the benefits of plain writing: fairness, efficiency, effectiveness, and the alignment of an organization's documents with its brand and culture (11). Commentators variously describe plain language's benefits as "just too obvious" (Bailey 7); ensuring accountability and credibility (*Clarity-international.net*), informing and empowering (*Clearest.co.uk*), and promoting usability and understandability (*Centerforplainlanguage.org*). Additionally, many plain language advocates point to the cost savings associated with plain language (Braley, Chase, Kimble), while others suggest it also prevents lawsuits (Gillespie Myers), encourages greater civic participation (Jones and Starford), reduces risks (Sikkema), and

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makes it easier for citizens to apply for and obtain benefits and services (*OMB Guidance* 1).

Fundamentally, however, it is the public's increased access to necessary information that plain

language activists—almost universally—point to as the primary benefit of plain writing. Not

only do some advocates say this increased access to information by way of plain language is a

civil right (*Centerforplainlanguage.org*), there are also those who claim it is a human right

(Mowat qtd. in Pruden). Whether or not access to information is a human right is arguable;

however, the plain language movement, as evidenced by its history, stated benefits, and goals

can certainly be characterized as a rights-based movement. It is about taking the steps necessary

for ensuring the public has access to the information it needs, can understand that information,

and is able to use it to accomplish the desired objective—whether the objective originates with

the writer (increased compliance a law or regulation) or the user (obtain a benefit or service).

1.6   Plain Language: A Timeline

Commentators generally identify the mid-1970s as the starting point for the "modern" plain

language movement, which was a response to what some perceived as inflated and convoluted

legal and bureaucratic writing (Dorney, Felsenfeld). The Plain Writing Act is but one of many

recent initiatives in the modern plain language movement. There are also plain language

requirements in the Credit Card Accountability Responsibility and Disclosure Act of 2009 (PL

111-24), the Dodd-Frank Wall Street Reform and Consumer Protection Act (PL 111-203), and

the Patient Protection and Affordable Care Act (PL 111-152), among others. Additionally,

President Obama issued Executive Order 13563 in January 2011, a directive that requires the

federal regulatory system to "ensure that regulations are accessible, consistent, written in plain

language, and easy to understand" (Sec. 1). To that end, Representative Braley introduced yet

another plain writing bill in January 2012: the Plain Regulations Act of 2012. The bill ultimately

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died in committee (*Govtrack.us*); however, Braley reintroduced it in April 2013 as the Plain

Regulations Act of 2013. This proposed legislation requires federal agencies to use plain writing

in all new and revised regulations, defining plain writing as writing that is "clear, concise, well-

organized, minimizes cross references, and follows other best practices appropriate to the subject

or field and intended audience" (Sec. 3 (3)). As of this writing, the Plain Regulations Act

remains in committee.

1.6.1.   The "Modern" U.S. Plain Language Movement

Jensen says the modern plain language movement began as a way to increase citizens' access

to justice, in particular, those groups that "historically have not had the resources to understand

and interpret the law" (807-808). She points to a Citibank consumer promissory note that was

rewritten in plain English in 1975 as the initiative that launched the plain language movement

(808). According to legal expert Carl Felsenfeld, the state of New York quickly followed

Citibank's example by legislating plain language in all contracts of $50 or less (409-410), and a

number of other states then adopted statutes requiring plain English in consumer contracts

(Kimble, *Writing for Dollars* 54). Others claim that the modern plain language movement in the

U.S. began with a USG initiative: Richard Nixon's call for regulations published in the *Federal*

Register, the official journal of the USG, to be written in "layman's terms" (Greer 140; Lutz qtd.

in Dorney n. pag.). However, plain writing has a much longer history than is often credited to it,

with many plain language initiatives originating in USG institutions.

The U.S. Geological Survey's George Smith argues in a 1915 essay that government

scientists often fail to write in a way that is understandable to the public, calling for the agency's

reports to be written "in the language of the people" (632). Cutts points out that both Winston

Churchill and Theodore Roosevelt supported Basic (or Simple) English (Loc. 456), and in his

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1946 article "In Praise of Plain Writing," critic and essayist Brooks Atkinson praises the plain

prose of writers such as Benjamin Franklin. Plain language rumblings, it seems, were heard well

before the groundswell that took place in the 1970s, and they were often associated with the term

gobbledygook. Readability expert Stuart Chase credits Representative Maury Maverick (D-TX,

1934-1938) with coining the term *gobbledygook* to describe the inflated, confusing bureaucratic

language that the plain language movement aims to address (249). "Gobbledygook," says Chase,

"can be defined as squandering words, packing a message with excess baggage and so

introducing semantic 'noise'" (251). Chase differentiates between doublespeak and

gobbledygook, noting the honest intent of the latter and pointing to bureaucrats, academics, and

lawyers as the key culprits (251). John O' Hayre's *GobbledyGook Has Got to Go* is a 1966

booklet that attempts to address this confusing "bureaucratese." Still available on the U.S. Fish

and Wildlife Service's website, the organization says the booklet is "still sadly relevant today"

(*FWS.gov*). Unlike most modern plain writing efforts, O'Hayre's focus is on "writability" instead

of on readability. However, his "Write Formula" reflects plain writing guidelines, including the

use of simple words, active verbs, and short sentences. The Fish and Wildlife Service advertises

the booklet as a tool to help writers avoid "jargon, platitudes, wordiness and all other ills that can

destroy plain English" (*FWS.org*).

Regardless of how or where the modern plain language movement started, the idea of

ensuring access to information through clear and concise writing had taken hold in the U.S. by

the late 1970s, and it appeared that plain language would not be going anywhere anytime soon.

Yet despite the need for and reported benefits of plain language, the USG's commitment to plain

language has waxed and waned over the years based on administration priorities. In March 1978,

for example, Jimmy Carter issued Executive Order 12044, which required clarity and simplicity

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in government regulations. However, Ronald Reagan replaced this emphasis on plain language in

government regulations with a focus on performance metrics, costs, and benefits, revoking

Executive Order 12044 with Executive Order 12291 (Greer 140). Still, plain language lived on in

USG agencies, albeit without presidential directive and on a case-by-case basis

(*Plainlanguage.gov*). The Document Design Center, for example—a government-funded

collaboration that included Carnegie-Mellon University, the American Institutes for Research,

and Siegel + Gale, a private branding company—was "home" for plain language work in the

U.S. between 1979 and 1997 (Kimble, *Writing for Dollars* 78). Ultimately, several individuals

affiliated with this initiative, specifically, Schriver and Ginny Redish, would become key plain

language advocates and help to define the U.S. plain language program.

1.6.2. Plain Language Advocacy

During the same timeframe, plain language advocacy was picking up steam in other English-

speaking countries, including Australia, Canada, New Zealand, and the UK. From the mid-1970s

on, these countries have been the sites of numerous plain writing initiatives, including those

spearheaded by the Canadian government, the UK's Plain English Campaign and Plain

Language Commission, New Zealand's Law Commission and the Parliamentary Counsel Office,

and Australia's Centre for Plain Legal Language (Kimble, *Writing for Dollars* 82-100). Plain

writing efforts, both in the U.S. and abroad, all had the same fundamental goal: reduce the

"gobbledygook," bloat, legalese, and officialese in government, legal, and business documents

and make information more accessible, understandable, and usable for readers.

The network of plain language advocates grew as well, revealing the plain language

movement's distinctly international flavor. In 1953, a group of U.S.-based legal writers

established Scribes, an organization focused on promoting "a clear, succinct, and forceful style in

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legal writing" (*Scribes.org*). John Walton founded Clarity International in the UK in 1983, a "worldwide group of lawyers and others who advocate using plain language in place of legalese" (*Clarity-international.net*). Chrissie Maher and Cutts established the Plain English Campaign in Britain in 1979, although Cutts left the organization and established the Plain Language Commission in 1994 (Kimble, *Writing for Dollars* 90). In the U.S., a group of federal employees began to meet in 1996 to discuss plain writing in government documents, and this group became PLAIN (Cheek, Clarity 2010 Presentation). The National Council of Teachers of English (NCTE) took a position on plain language as well, forming the Public Language Award Committee, which, in 1974, began to award the Doublespeak Award to a public spokesperson for his or her use of deceptive language (*Ncte.org*). Additionally, in 1975, NCTE established the Orwell Award for outstanding contributions to public discourse (*Ncte.org*). By the end of the 1990s, plain language activism was firmly in place and increasingly organized.

1.6.3. Plain Writing Gains More Traction in the U.S. Federal Government

Given this plain language activism and the successes of plain language initiatives, specifically those taking place in the U. S., it was inevitable that plain language would eventually find its way back into the USG's regulatory planning and review process, especially in light of the Clinton-Gore administration's focus on reinventing government and the benefits attributed to plain writing. If reinventing government was about making government open and responsive to citizens, streamlining, and saving taxpayer dollars, plain writing seemed to be an ideal tool for getting there. In October 1993, Bill Clinton signed Executive Order 12866, which says, "Each agency shall draft its regulations to be simple and easy to understand, with the goal of minimizing the potential for uncertainty and litigation arising from such uncertainty" (Sec. 1(b)(12)). Additionally, Clinton's February 1996 Executive Order 12988, Civil Justice Reform,

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mandates that agencies use "clear language" when developing, reviewing, or otherwise reporting on or analyzing regulations and proposed legislation (Sec. 3). Clinton followed up these executive orders with a June 1998 memorandum to heads of executive departments and agencies, directing them to use plain language, including common, everyday words, short sentences, personal pronouns such as *you*, and active voice.

Plain writing, it seemed, had found a place in the federal bureaucracy, in no small part due to Gore's efforts and his role in the National Performance Review, later renamed the National Partnership for Reinventing Government (National Partnership). Cheek, who was then an employee with the Department of Interior and PLAIN's chair, was a key player in Gore's efforts to implement plain writing in the federal government (Cheek, "The Plain Writing Act" 53). This push for plain writing in USG-generated documents resulted in numerous initiatives, including some that earned Gore's No-Gobbledygook Award (Cheek, Clarity 2010 Presentation). The award went to agencies such as the Food and Drug Administration, the Social Security Administration, and the Securities and Exchange Commission for their plain language successes (*Plainlanguage.gov*). Plain writing initiatives under the National Partnership covered regulatory documents and style manuals as well as documents aimed at the general public (*Plainlanguage.gov*). For example, in 1998, the Securities and Exchange Commission published *A Plain English Handbook* to help drafters develop clear disclosure documents.

Plain language efforts in the U.S. continued during the Bush administration. Cheek and her PLAIN colleagues established the Center for Plain Language; many state-level projects were initiated; plain language legislation was introduced in the House of Representatives—albeit unsuccessfully until Congress passed the Plain Writing Act—and key federal government documents, such as the 9/11 Commission Report, were written in plain language

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(*Plainlanguage.gov*). However, it was not until Barack Obama took office in January 2009 that plain writing began to enjoy greater visibility in the federal government, and that visibility came with legislative teeth: the Plain Writing Act of 2010. The Act requires each federal department and agency—at a projected annual cost of three million dollars (*Senate Report 111-102* n.pag.)—to implement a plain writing program and website, and all departments and agencies must report yearly on progress related to the implementation of plain writing (Secs. 4 and 5)). With its enactment, the Act laid the groundwork for institutionalizing plain language in the federal bureaucracy. If enacted, the Plain Regulations Act will further extend plain language priorities across the USG.

1.6.4. Plain Language's "Deep" History

While the Act, its implementing guidance, and the pending Plain Regulations Act appear to be the culmination of the plain language movement, plain language is anything but a new or even distinctly modern phenomenon. On the contrary, there have been attempts to simplify language as far back as there are documentary traces. Scholars and communicators have long advocated for plain language in efforts to rid both oratory and writing of excessive ornament, ambiguity, and complexity. The Act and other federal plain language mandates are but a few of innumerable attempts through the ages to simplify the language in documents and speech generated within the public sector, including government, legal, and business communications. These efforts can be traced all the way back to the Greeks and Romans. Cicero's *On Oratory*, for example, elevates to immortal status "[h]im who speaks distinctly, explicitly, copiously, and luminously, both as to matter and words (3:XIV) and conveys the need for stating a case "in such a manner that the detail may be probable, clear, and concise" (2:XIX). Similarly, Aristotle emphasizes the need to consider "the virtue of style . . . to be clear," pointing out that if speech is not clear, "it will not

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perform its function" (3:2,1). He links clarity to grammatical correctness, suggesting five

principles for speaking well: 1) the correct use of connective particles, 2) "calling things by their

specific names and not by circumlocutions," 3) avoiding the type of ambiguity that can result in

equivocation, 4) observing grammatical agreement with respect to the gender of nouns, and 5)

using the plural and singular forms correctly (3:5,1-5). Cicero points out that "purity and

clearness of language" are key so that "what every person says may be understood—a

qualification which we perceive indeed to be necessary" (3:X). Further, *On Oratory* urges

rhetors to "adopt[] words in common use, and such as aptly express what we wish to

communicate or explain, without any ambiguous word or phrase, not making our sentences too

long" (3:XII). Clearly, the Greeks and Romans had the same concerns as today's plain language

advocates about how to communicate clearly and effectively.

This attention to clear and simple communication continued through the Medieval period and

into the Renaissance. Statements about the need for the plain style can be found, for example, in

the works of St. Augustine, who links a "subdued style" to understanding (162), as well as in the

writings of English kings and Chaucer (Cutts Loc. 416). Commentators also point to the 1362

English Statue of Pleading as an early example of plain language (Jensen 809). A shift in

rhetoric's focus away from Aristotle's five canons toward style and delivery reinforced, in large

part, this emphasis on the plain style. Instrumental in this transition were French philosophers

and educators Petrus Ramus and Omer Talon, for whom "plainness and simplicity of expression"

were especially important (Ong 283). Preference for "a plain and easy Stile [sic]" is also evident

in texts such as William Mather's *The Young Man's Companion*, first published in 1681 (1).

Religious moderates in the Royal Society made the case for plain scientific prose that was

"stripped of ornamentation and emotive language" (Baugh and Cable 254), and the Puritans

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linked the plain style to virtue (Weaver 27) and purity (Blake 187). Calls for plain language even appeared in literary texts, for instance, "Plain Thoughts in Plain Language: A New Ballad," which was published in 1743 for W. Webb. Throughout history, commentators have focused on the same objectives for clear communication that contemporary plain language initiatives attempt to further: simplicity and clarity.

1.6.5. Audience-Driven Writing and Perspicuity: Plain Language by a Different Name

An emphasis on clarity and simplicity in language also found a home in modern rhetoric, including through the efforts of Hugh Blair, George Campbell, and Richard Whately. It is an approach to language for which "conciseness and simplicity are essential to Sublime Writing" (Blair 83) and recognizes perspicuity as an audience-specific quality (Whately 258). From Blair's perspective, perspicuity comprises purity, propriety, and precision. He defines *purity* as words and phrases that are native to the language and *propriety* in terms of culturally appropriate usage (Golden and Corbett 68). Blair expresses a preference for simplicity and argues that the key to sublime writing "is to say great things in few and plain words" (96). Like Blair, Whately points to perspicuity as the most important element of style, cautioning writers, for example, that the length of sentences can obscure the point of a text (263). Campbell also highlights the importance of the audience, stating that the study of an audience is necessary in order to effectively make an argument (206). Just as today's plain language experts point out that what is plain language for one audience is not necessarily plain for another, Campbell explains that audiences differ both intellectually and in terms of "moral attainments" (Golden and Corbett 223). Thus, theories of rhetoric and writing—as Blair, Campbell, and Whately have influenced them—are modern incarnations of the ancients' concerns with clarity, simplicity, and audience.

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Mary Carbone argues that the theories of Blair, Campbell, and Whately provide the underpinning for modern-day business communication principles through the work of George Burton Hotchkiss, who incorporated their emphasis on precision, clarity, grammatical correctness, simplicity, and perspicuity into his business communication pedagogy (173). It is an approach that constitutes the "Cs" still prevalent in contemporary understandings of effective workplace communications: *conscience, confidence, collaboration, consensus*, and *communication* (Gorges); *coalitions, communications, credibility*, and *contingencies* (Bloom and Dees); *clear/concise/crisp, complete, codirectional, customized, circular/checked, cumulative/consistent, considerate/concerned/ contact-full, celebratory*, and *committed* (Pater); *clear, consistent, convenient*, and *compelling* (Klausner); and *concise, complete, conversational, clear, considerate, confidence*, and *check* (Anderson). Even a brief scan of the literature supports Carbone's claim that the rhetoric of Blair, Campbell, and Whately has been foundational to generations of communicators, including those who advocate the principles of plain language. It is a foundation that Nan Johnson says requires the writer or speaker to "control 1) grammatical correctness in diction and sentence structure; 2) the major qualities of style (perspicuity, energy or vivacity, and elegance); and 3) the use of figurative language" in order to transmit knowledge (191). For that transmission to be effective, the text must be clear, concise, and well written (or spoken) and appropriate to the audience. In other words, communication must be in plain language.

With its emphasis on creating and delivering clear, simple, audience-centric communications in a manner that makes them accessible, understandable, and usable, the modern plain language movement is clearly a continuation of the emphasis on style that has been present in philosophies of writing and oration since ancient times. From Cicero to Samuel Mather; from Blair, Campbell,

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and Whately to Flesch, Chase, and O'Hayre, today's plain language activists are in good

company. The list of individuals, groups, and organizations that have sought to rid the language

of excesses of any form is both long and illustrious.

1.7. Plain Language Tensions, Gaps, and Criticism

1.7.1. The Plain Writing Standard: What "Good" Writing Looks Like

Despite plain language's long history and growing momentum, there are critics who

challenge its purported benefits. There are also tensions within the movement as well as calls to

address what some view as problems with and gaps in plain language approaches. For example,

there is some concern that no "standard" for plain writing exists. Felsenfeld notes that the

"vagueness of the language standard" was a problem in early plain language efforts because the

meaning of terms (*clear, coherent, common, everyday*) was ambiguous (410). This ambiguity

continues to be a problem for commentators such as Plain English advocate Ben Piper, who

points out the challenges of having laws about a concept that does not have an internationally

accepted definition. The result, he says, is that the courts have to arbitrate what is and is not plain

language (30). Lynda Harris, Susan Kleimann, and Christine Mowat note the value of a

"'perfect' plain language standard—one that would leave no doubt that a text was truly in plain

language" (16). Harris et al. suggest that the criteria for such a standard would acknowledge the

reader's need to understand and use information; place responsibility on the writer for clarifying

his or her thoughts yet acknowledge that there is judgment involved in this process; prioritize

"big picture" concerns such as structure, purpose, etc.; focus on grammar, usage, and mechanics;

employ some form of reader testing; and "be applicable across all languages, documents, and

audiences" (16).

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Establishing any type of standard, including a "perfect" plain writing standard, implies writing that does not meet this standard is lacking. Indeed, plain writing advocates often associate plain writing with "good" writing and deem writing that does not follow plain language guidelines as "bad" or "poor" writing. In this paradigm, good writing is writing aimed at simplification instead of complexity, uses short instead of long sentences and paragraphs, common words instead of jargon, and concrete instead of abstract ideas. There are many examples of this form of language valuation. Kevin Collins, for example, links good legal writing to plain language, differentiating it from bad legal writing that does not adhere to the principles of plain language (431). Christopher Lasch clearly equates the plain style to good writing, including in his book *Plain Style: A Guide to Written English* a chapter entitled "Characteristics of Bad Writing." Bailey, too, makes such a link in the context of concreteness, a characteristic of plain writing, he says, hence, good writing (86). Cutts also implies that plain language equates to good English when he notes: "Part of writing well is 'writing tight,' ruthlessly cutting dross" (Loc. 1552), a statement often quoted in plain language literature. Likewise, Felsenfeld blurs the distinction between plain English and good writing, suggesting that by correcting such "lawyer-like" writing behaviors as using long sentences and words that add no meaning, bad writing begins to "look like English and is more available to the lay reader" (412). Public policy scholars Robert Watson and Thomas Lynch link good writing and plain language in the strongest possible terms, pointing out, "Bureaucrats speak to the public and write regulations using 'grammatical garbage' laden with acronyms, abbreviations, and technical jargon" and claiming that government bureaucracies are rife with such "misuse" of language (107). Further, verbosity and pompous words may equate to bad writing (Flesch, *ABC of Style* vii), but "[a]bstract words are the most common disease of modern writing" (Flesch, *ABC of*

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Style 7). Of course, everyone knows that overweight and diseased are not good things to be, and plain writing is touted as the way to fix these conditions. The message could not be clearer: for writing to be good, it must be plain.

1.7.2. Standards Versus Context: A Critical Tension in Plain Language Representations

Efforts toward the establishment of a plain language standard notwithstanding, commentators generally pay close attention to usage and how, historically, social changes have impacted words and expressions. In addition to making the case for moving away from language that uses large words, complicated syntax, and jargon, plain language literature often acknowledges that words come and go as well as the fact that their meaning shifts in context. For example, both Cutts and Collins address the issue of archaisms. Collins points out their prevalence in traditional legal writing and argues for their elimination (432). Cutts highlights the fluidity of language, saying, "We shouldn't worry if archaic words disappear from time to time. When people no longer understand a word, or if it is not doing a useful job, its day is done and other words will move in to fill the gap" (Loc. 781). On the other hand, there are commentators for whom "correct" grammar and mechanics, as based on "standard" written English, are part and parcel of the plain language paradigm. For them, plain language flexibility does not extend to the rules of grammar and punctuation. Cutts, for example, advises writers to "Put accurate punctuation at the heart of your writing" (Loc. 485). Bailey points out that correct emphasis within a sentence requires correct punctuation (58), and plain English specialist Colleen Trolove considers correct grammar to be an essential element of plain English (17).

These conflicting stances highlight a fundamental tension in plain language representations: adherence to standards (grammar, plain language, good writing, etc.) versus responsiveness to context. Standards suggest a lack of flexibility, while responsiveness to context implies the

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reverse. The push for a plain language standard and EAE-based conceptions of good plain writing delimit plain language according to specific criteria (e.g., grammatically correct, universally applicable). Responsiveness to context, however, means that grammar, punctuation, usage, design, and organization, etc., *facilitate* the goal of plain language to make information understandable, hence, usable, in a particular situation and for a particular audience. Thus, representations of plain language as a standard, whether a plain language or an EAE standard, conflict with representations of plain language as contingent on situation, on subject, and on audience.

1.7.3. Plain Language for Whom?

The standard-contingent tension aside, advocates almost always forward plain writing as audience-centered writing. However, this emphasis on audience tends to credit both writer and audience with a certain linguistic neutrality across whatever functional (engineer, teacher) or social (PhDs, eighth graders) categories they represent. "Don't write for an 8th grade class if your audience is composed of PhD candidates, small business owners, working parents, or immigrants" (*Federal Plain Language Guidelines* 1). In this paradigm, there is "the" writer, "an" audience, and "a" way of plain writing to which both the writer and an audience have access. Kimble, for example, claims that the guidelines for plain writing he provides in *Writing for Dollars* "should work more universally," that is, beyond legal writing (31). He also suggests that it is not as difficult to identify an audience as some plain writing critics make it out to be (31). Similarly, none of the plain language websites address how plain language can or should accommodate different language practices. Clarity, Scribes, the Plain Language Association International, the Center for Plain Language, and PLAIN do not even discuss what plain language means to a linguistically diverse audience or how such an audience's communicative

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traditions might impact the perceived benefits of plain language. These organizations also do not

account for diversity with respect to writers, or how such diversity might impact their plain

writing work.

There are, however, some plain language commentators who address language difference

directly. Schriver makes a case for complicating conceptions of audience (PLAIN 2013

Presentation), and although plain language consultant Mowat advocates for a plain language

standard along with Harris, she also claims that plain language accommodates diversity of

education, reading level, and ethnic background (qtd. in Pruden). Kim Garwood points out the

metonymic nature of plain language, arguing that it implies a certain level of contextual

understanding (168). Her analysis has implications for both the writer and reader, who, if lacking

context, may not have the linguistic resources necessary for accessing, conveying, or responding

to information the way it is intended for a particular audience. Other commentators raise issues

of diversity to argue that plain language does not adequately respond to the needs of linguistic

minorities. For example, Jensen says the idea that plain writing makes justice more accessible to

racial and linguistic minorities is good in theory, but she suggests the documents plain English

efforts affect are unlikely to be seen or used by the very populations that would most benefit

from plain English (822). Crystal also addresses linguistic diversity, positing language

appropriateness: "Different usages are appropriate to different settings" (Loc. 1197). It is a

variation on the idea that plain language is contingent on audience. In Crystal's framing, not only

is it true that what is plain for one audience is not always plain for another, but also what is plain

for one writer is not necessarily plain for either the audience or another writer.

There are also commentators who address what plain language means for speakers of English

as an additional language (EAL). Stephens and Terry Kaufman discuss language differences in

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Plain Language in Plain English. They point out, for example, that German readers "will appreciate the short, blunt Anglo-Saxon word instead of a word with a Latinate base," while those who speak a romance language will prefer the reverse (56). Some consider the impact of plain language on EAL readers and writers from the intercultural communication perspective (Thrush), the legal writing perspective (Martínez Villarroya, Costello), or both (Bain Butler). Joanna Richardson, for example, teaches English at a law firm in Argentina. Her argument differs from Crystal's in that, whereas Crystal expresses difference as acceptable, appropriate to, and even expected across communications, Richardson engages in a type of linguistic leveling. She summarizes the advantages that writing in plain English provide for bilingual and multilingual companies, claiming, "English has become a common language for people of different nationalities; therefore, a clearer, more concise way of writing in English will be more readily understood by non-native English speakers" (20). Richardson articulates, more or less, a one-to-one correlation between the clarity and conciseness of a communication in English and English language competency generally. In other words, *if* you speak, read, or write in English— regardless of any of the factors that influence your ability to do these things—and *if* something is in plain English, that communication will be more understandable to you than if it were not in plain English. In this sense, the plain style of a text is what makes it understandable: English language competency + plain language approach = comprehension.

Richardson's views are not necessarily supported by research at the intersection of intercultural communication and plain language, and in some cases, the scholarship contradicts her claims. Emily Thrush, for example, conducted a study that determined some plain writing features may actually make a text more difficult for readers whose first language is not English (295). Her research suggests that plain writing across language traditions is not at all the one-to-

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one proposition Richardson implies. On the other hand, Donna Bain Butler, whose expertise is in applied linguistics, argues that plain language helps legal writers negotiate differences related to language practices (33). She points out in her discussion of EAL writers, legal writing, and plain language that such differences relate to understandings of reader and writer responsibilities as well as to logic, among others (33). Although Thrush and Bain Butler reach different conclusions, their scholarship suggests that linguistic diversity matters in the plain language context. However, as Thrush points out, plain writing principles are grounded in the language practices of those for whom American English is a first language (290). So when Bain Butler explains, "Plain-language strategies help the writer express legal ideas clearly and correctly in all genres of legal writing" (33), she implies the existence of an EAE standard against which clarity and correctness can be determined. Further, it is a standard of legal writing that Bain Butler represents as good writing (32).

1.7.4. Challenging Plain Language's Claims

The purported benefits of plain writing make its value obvious: clear, concise, and well-organized communications support civil and human rights by providing citizens with accessible, understandable, and usable information they need, all the while saving taxpayer dollars and avoiding lawsuits. Nonetheless, there are those who take issue with plain writing and what its supporters claim it can do. For these commentators, the benefits of plain language are not as obvious as Bailey suggests. Critics argue that plain language compromises accuracy for simplicity (Stark n. pag.), cannot necessarily accomplish what more technical writing can (Assy 378), and results in the simplification of material for the benefit of the layperson at the expense of critical content that requires the expert, e.g., the lawyer (Bennion 63). Plain language experts are quick to respond, however, that plain writing is not "anti-intellectual, unsophisticated, drab,

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ugly, bland, babyish, or base" (Kimble 11). Rather, they say it is an accessible, straightforward, and precise presentation of material (*Centerforplainlanguage.org*). Still, critics insist there are problems with plain writing, including the Center for Plain Language's guidance that "less is always more" (*Centerforplainlanguage.org*). As Stephens cautions, there are cases when more is actually better (*Plain Language in Plain English* 73). Additionally, commentators point out that short words and sentences do not always express an idea in the best or even clearest way (Barnes 705) and diverse language traditions and levels of literacy challenge understandings of clarity and simplicity (Garwood, Sikkema, Thrush). For his part, Kimble concedes that the comprehension of plain language legislation sometimes remains lower than hoped (qtd. in Barnes 674), an acknowledgement that critics are quick to latch onto (Barnes 674).

Some commentators—advocates and critics alike—point out the problems related to access, comprehension, and usability that plain language is purported to address extend beyond the writing paradigm itself. They express concern with the assumption that the unintelligibility of documents written in traditional style, i.e., in bureaucratic language, has only to do with this type of writing, that it is not also the result of other factors. They contend that despite simplification of a form or document, readers will still have questions, doubts, and problems with the text (Barnes 706). Rabeea Assy, a member of University of Haifa's law faculty, argues that the plain language movement's focus on language and style does not address the complexities inherent in law, a complexity that simplification and improved organization alone cannot eliminate (367). Assy does not deny that plain writing provides benefits, but he stresses that the "strong rhetoric" of plain writing activists misleads citizens into thinking that plain language alone is the panacea for their inability to comprehend legal documents (382). From this perspective, the context in which language practices exist and operate—whether they are based on plain or traditional

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bureaucratic language—is a prominent factor in whether and to what degree a text is understandable.

1.8. Conclusion: Why Plain Language Research is Important

As the Plain Writing Act ultimately proves, U.S. lawmakers were (and are) receptive to the plain language movement's agenda. However, it is unclear to what extent this agenda is based on research. Bailey argues that while plain English might once have been a preference, psycholinguists show that plain language is easier for every audience, regardless of level of education (5). Assy, however, claims that, empirically, studies do not necessarily support the purported benefits plain English (387). Schriver, on the other hand, offers numerous examples of how research both supports plain language principles and troubles them (Clarity 2012 Presentation, Plain 2013 Presentation). Nonetheless, evidence-based plain language research is precisely what she calls for (Plain 2013 Presentation). Additionally, Thrush points out the need for further plain language study in support of the "continued improvement of communication among the peoples of the world" (295), the plain language movement's purported goal. Mazur suggests that the plain writing movement needs more contributions from academic and research organizations (205), a call that Schriver also takes up in *Clarity*'s 2010 issue. "Currently," she says, "there is limited research conducted specifically with a plain language agenda in mind" (32), pointing out that research is scattered, fragmented, and primarily based on English (36). Almost four years later, there is still little scholarly research with an explicitly plain language focus outside of special interest groups such as Clarity.

U.S. plain language legislation is a rich research site; we need to study how plain bureaucratic plain language operates so we have the knowledge to respond to its impact on writers and readers and understand its significance for pedagogy—and vice versa. This review of

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the literature shows that for all the progress of the plain language movement in the last 40 or so

years, and there has been much, there is still a great deal of ambiguity about what plain language

is and uncertainty about what plain language can do—and for whom. Despite the many

uncertainties, tensions, contradictions, and unanswered questions this literature review exposes

about the modern plain language movement, it also highlights plain language's possibilities and

contributions insofar as it facilitates understanding. Plain language continues to make significant

inroads in institutions and organizations around the globe, including its institutionalization in

USG departments and agencies. Plain writing is here to stay—and, at least for the time being, as

law. It behooves us, then, as citizens and writing studies scholars, to understand what plain

language is and does, how it operates in the bureaucratic context, and what it means as both

policy and practice.

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Chapter 2. Research Methods

"Each restaurant has the same shoe-box shape, the same jukebox selection interlarded with Waffle House tributes and novelties" (Junod n.pg).

Interlard: to vary by intermixture, intersperse, interlace

2.1.   Introduction

Throughout history, countless individuals, organizations, and initiatives have pushed for the

plain style in oration and writing. Plain language has been a continual presence in efforts to

manage, either directly or indirectly, language practices. The number of plain language

mandates, whether statutory or non-statutory, has grown during the last 40 years—both in the

U.S. and around the globe. This increased focus on plain language, particularly in light of its

formalization in U.S. law, invites investigation into what plain language is and what it affords

stakeholders at the various levels of language policy. What is the plain bureaucratic language

mandated by the Plain Writing Act of 2010? What does it do for agencies, federal writers, and

users of USG documents? This chapter describes the research project I designed in order to help

answer these questions and the methods I used to carry out my plain language research.

2.2.   Research Methods

Cassels Johnson points out that traditional policy research takes a top-down approach to

determining whether and to what extent implementation is consistent with the intent of

policymakers. He notes, however, that not only does this approach assume knowledge of

authorial intent, but it also fails to account for the roles, beliefs, and influences of other

stakeholders across the various policy layers (Loc. 2063). Teresa McCarty makes a case for

considering language policy as a "practice of power that operates at multiple, intersecting levels"

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(314), and Spolsky agrees that authority and power are fundamental to the language policy

context (*Language Policy* Loc 902). Further, as does Cassels Johnson (Loc. 410), McCarty views

policy as "processual, dynamic, and in motion" (Loc. 291). Put another way, language policy is

inherently linked to the power relationships that exist among stakeholders, and it is action as

much as it is an object, that is, an official text. Thus, the Plain Writing Act of 2010 can be

viewed as the "complex of practices, ideologies, attitudes, and formal and informal mechanisms

that influence people's [stakeholder's] language choices" (McCarty Loc. 169). These

stakeholders include the law's drafters, the USG agencies implementing the Act, the federal

employees who must write using plain language, and the audiences for plain bureaucratic

language. I designed this study, then, to get at stakeholder attitudes about plain language and

their understandings of what it does in the bureaucratic context. Additionally, I hoped to better

understand the processes, practices, and beliefs that influence conceptions and implementations

of plain language at the institutional, federal writer, and user levels.

I used a three-pronged approach to conduct the research summarized in the following

chapters. Each prong presented both opportunities and challenges for examining representations

of plain bureaucratic language and its impact on writers and users of federal government

documents. First, using Virginia Tech's online survey tool, I conducted a survey of individuals

who write USG documents. I then used the survey to follow up with respondents in one-on-one

interviews that expanded on the themes that emerged in answers to the survey questions. Second,

I conducted two focus groups with users of federal government documents, followed by several

one-on-one interviews. Finally, I analyzed federal agencies' 2013 Plain Writing Act compliance

reports. I used these methods to study what plain language, as the Act defines it, means for

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agencies, federal writers, and users of USG documents as well as whether and how plain

bureaucratic language impacts the accessibility, understandability, and usability of official texts.

The sections below provide detailed descriptions of each of the three prongs of my research.

2.2.1.   Writers of USG Documents

My focus for this part of the study was on the individuals who write federal government

documents, whether forms, brochures, procedures, regulations, or website content. In

consultation with a team of statisticians with Virginia Tech's Laboratory for Interdisciplinary

Statistical Analysis (LISA), I developed an online survey tool. I wanted to know whether and

what federal writers know about the Plain Writing Act specifically and federal plain language

mandates generally. I also wanted to find out what they consider to be the clear, concise, and

well-organized writing the Act requires and how they identify the "best practices appropriate to

the subject or field and intended audience" (Sec. 3 (3)). Additionally, I sought to understand

whether and how the Act impacts the way federal writers do their jobs; how accessible,

understandable, and usable they believe their plain language documents are for users; and

whether and how they (or their agencies) measure this impact. Finally, I included questions to

get information about respondent demographics, including general descriptions of their agencies,

length of service, occupational specialty, age, gender, and ethnicity and race. To protect

respondents' identities, I did not ask for any personally identifying information or specifics about

their agencies. When respondents provided information that could identify them or their

agencies, I redacted their responses in order to protect their anonymity.

Consistent with survey and interview best practices (see Willis, for example), prior to going

live with the survey, I conducted a pilot test with two former federal employees in order to get

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their feedback. One respondent was a long-time government executive, the other a former law enforcement official who currently works part-time as a contract employee with the federal government. Both participants suggested changes related to the survey's clarity and organization. They also pointed out problems with some of my assumptions that could interfere with respondents' ability to answer the questions. In consultation with the LISA team, I revised the survey to address the problems and inconsistencies the testers uncovered during the pilot phase.

I used convenience sampling, a non-probability approach, to conduct this segment of the study. I began by contacting PLAIN co-chairs Kathyrn Catania (U.S. Citizenship and Immigration Services) and Katherine Spivey (General Services Administration), who suggested I join PLAIN in order to access the group's Yahoo email list. After doing so, I provided the link and a flyer describing the research project to other PLAIN members, asking them to fill out the survey and requesting that they disseminate the survey link within their respective agencies. The response to this initial request for assistance was immediate, but it was also surprising. Within just days of sending out the request for assistance, six individuals had expressed interest in taking part in a one-on-one interview, and people continued to volunteer throughout the data-gathering process. Indeed, I had more volunteers than time to interview them. However, I had only ten survey responses two months after posting the survey link, so I pushed the link out through my own contacts in various federal agencies. Most of these contacts agreed to disseminate the link to their contacts. Some of these contacts are in federal service, others are retirees, and a number are contract employees with federal agencies. Ultimately, it took more than three months to obtain 26 survey responses, which, collectively, represent an array of federal government agencies.

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WI=Writer Interviewee   UI=User Interviewee

I interviewed a total of six federal employees as part of this research, and together with the survey respondents, they represent a diverse group of organizations and occupational specialties. I sought and obtained a waiver from Virginia Tech's Institutional Review Board (IRB) so federal participants in the one-on-one interviews would not need to sign a consent form. Obtaining a waiver to the consent form requirement helped to ameliorate, although not eliminate, concerns relating to anonymity. All the interviews took place by telephone and lasted approximately one hour. I read a consent script prior to each interview and obtained participants' verbal consent before proceeding with questions and used a guided-interview approach. In some instances, I transcribed an interviewee's responses word-for-word, and these statements are indicated by quotation marks in the chapters that follow. Text that is not in quotation marks is a gloss of the discussion. To ensure that my use of the interview content is consistent with the spirit in which the interviewee intended it, I provided them with those portions of the analysis that reference their statements—whether glosses or direct quotations. I asked the interviewees to validate that I accurately represent their statements.

2.2.2.   Users of Federal Government Documents

To better understand how users of USG documents perceive plain bureaucratic language, I conducted two focus groups and four one-on-one interviews. The goal of these focus groups and interviews was to get user feedback on USG documents generally and plain language documents specifically. I wanted to know if users relate differently to plain language documents than to non-plain language documents and, if so, how. I also wanted to test out plain language on the groups Jensen suggests would most benefit from it: racial and linguistic minorities as well as economically disadvantaged populations (819). I hoped that the focus groups and interviews

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would provide insights about user understandings of plain language and what it does. Are these documents accessible, understandable, and usable? Is, for example, converting forms into web-based formats—which many plain language initiatives do as a way to make them more accessible to users—an effective approach?

I planned to use what Richard Krueger and Mary Anne Casey would call a multiple-category design for my focus groups (31). My goal was to have one group with low-income individuals of all races, another group that included ethnic and racial minorities, and one comprising linguistic minorities. There are both advantages and disadvantages to using what I considered to be homogeneous groups. For example, some scholars suggest shared experiences may minimize the need for participants to explain themselves to the group (Morgan 152). Others posit that answers may be based on unquestioned assumptions the group has as a whole (Parker 280). However, Krueger and Casey point out that people are generally more forthcoming with their thoughts when there is homogeneity "but with sufficient variation among participants to allow for contrasting opinions" (71). As it turns out, the participants in both focus groups are linked by one or two key factors, but they are also diverse in ways that I had not expected.

To organize these focus groups, I asked for help from local organizations that provide support and services in my community, including those entities that respond to the needs of the elderly, people living in poverty, minorities, and other traditionally underserved communities. In order to protect the identities of study participants, I have redacted any references to our community, the organizations I worked with, and any other information that might identify the individuals who took part in the study. A local faith-based group (Organization A) that works specifically with individuals who are trying to get out of poverty disseminated a flyer about the

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research project to its clients, organizing and hosting the first focus group. This session took

place on December 10, 2013. Seven individuals took part in the discussion. Another faith-based

group (Organization B), which provides a broad range of services to clients, organized and

hosted a second focus group.[6] This session took place on January 22, 2013, and also consisted of

seven people. All focus group participants were 18 or older, and there were no exclusions based

on gender, ethnicity, race, level of education, age, or sexual orientation.

At the beginning of each focus group, I provided participants with numbered folders. The

folders contained the following items:

- Name tag or tent card with the individual's randomly assigned number

- IRB-approved consent form

- Questionnaire

- Packet of forms

- Scratch paper for taking notes

I began the focus group by giving a step-by-step explanation of what would happen during the

session. Participants then read the IRB-approved consent form, and if they had questions, we

talked about their concerns. Although all participation was anonymous and each individual was

assigned a number that other participants and I used to refer to them, I wanted to record the

sessions in order to ensure the integrity of my notes. I asked each participant if he or she was

willing to be audio and video recorded. FG2-1 initially expressed reservations about being video

recorded, but he later consented to it because "it's so important what you're doing." All other

focus group participants agreed to being audio and video recorded.

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After focus group participants signed the consent form, I asked them to complete a questionnaire. The questionnaire was developed in consultation with LISA and includes the before-and-after plain language texts below. I asked participants to indicate which of the two examples is easiest to understand or whether they are equally easy or equally hard to understand.[7] When participants completed the questionnaire, we began the discussion by talking about their general experiences with forms. As with the one-on-one interviews, I used a guided interview approach. Some scholars suggest that this directed approach has negative implications for synergy and spontaneity, but the guided interview also facilitates the detailed discussion of specific questions (Stuart et al. 91). Finally, I asked participants to give their impressions of a randomly selected set of USG plain language and non-plain language documents.

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Example A

Example B

WI=Writer Interviewee   UI=User Interviewee

Example C

Example D

This is a multipurpose passenger vehicle which will handle and maneuver differently from an ordinary passenger car, in driving conditions which may occur on streets and highways and off road. As with other vehicles of this type, if you make sharp turns or abrupt maneuvers, the vehicle may roll over or may go out of control and crash. You should read driving guidelines and instructions in the Owner's Manual, and WEAR YOUR SEAT BELTS AT ALL TIMES.

Example E

TURKEY BASICS: STUFFING

Make sure you cook both your turkey and your stuffing completely. If you don't, bacteria that can make you sick may still be alive. Here are the most important things to remember about stuffing:

Cook the stuffing separately -- it's MUCH safer! If you absolutely have to cook the stuffing in the turkey, use a thermometer to make sure the stuffing reaches a temperature of 165 F and the turkey reaches a temperature of 180 F in the innermost part of the thigh. Measure the temperature of both the turkey and stuffing! Don't just trust a pop-up indicator!

Example F

TURKEY BASICS: STUFFING Thermometer Essential When Stuffing a Turkey

If stuffing a turkey, use a meat thermometer. Cooking a home-stuffed turkey can be somewhat riskier than cooking one not stuffed. Bacteria can survive in stuffing which has not reached the safe temperature of 165 F, possibly resulting in a foodborne illness. Even if the turkey itself has reached the proper internal temperature of 180 F in the innermost part of the thigh, the stuffing may not have reached a temperature in all parts of the stuffing sufficient to destroy foodborne bacteria. If stuffing does not reach 165 F when the turkey itself is done to 180 F, further cooking will be required. During the added cooking necessary to bring the stuffing up to a safe temperature, the meat may become overcooked.

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Example G

Drug Facts

Active ingredient (in each tablet)   Purpose
Chlorpheniramine maleate 2 mg...Antihistamine

Uses temporarily relieves these symptoms due to hay fever or other upper respiratory allergies: ■ sneezing   ■ runny nose   ■ itchy, watery eyes   ■ itchy throat

Warnings
Ask a doctor before use if you have
■ glaucoma   ■ a breathing problem such as emphysema or chronic bronchitis
■ trouble urinating due to an enlarged prostate gland
Ask a doctor or pharmacist before use if you are taking tranquilizers or sedatives
When using this product
■ drowsiness may occur   ■ avoid alcoholic drinks
■ alcohol, sedatives, and tranquilizers may increase drowsiness
■ be careful when driving a motor vehicle or operating machinery
■ excitability may occur, especially in children
If pregnant or breast-feeding, ask a health professional before use.
Keep out of reach of children. In case of overdose, get medical help or contact a Poison Control Center right away.

Directions

adults and children 12 years and over	take 2 tablets every 4 to 6 hours; not more than 12 tablets in 24 hours
children 6 years to under 12 years	take 1 tablet every 4 to 6 hours; not more than 6 tablets in 24 hours
children under 6 years	ask a doctor

Drug Facts (continued)

Other information ■ store at 20-25°C (68-77°F)   ■ protect from excessive moisture

Inactive ingredients D&C yellow no. 10, lactose, magnesium stearate, microcrystalline cellulose, pregelatinized starch

Example H

Allergy Tablets

INDICATIONS: Provides effective, temporary relief of sneezing, watery and itchy eyes, and runny nose due to hay fever and other upper respiratory allergies.
DIRECTIONS: Adults and children 12 years and over—1 tablet every 4 to 6 hours, not to exceed 6 tablets in 24 hours or as directed by a physician. Children 6 to 11 years—one half the adult dose (break tablet in half) every 4 to 6 hours, not to exceed 3 whole tablets in 24 hours. For children under 6 years, consult a physician.
EACH TABLET CONTAINS: Chlorpheniramine Maleate 4 mg. **May also contain** (may differ from brand): D&C Yellow No. 10, Lactose, Magnesium Stearate, Microcrystalline Cellulose, Pregelatinized Starch.
WARNINGS: May cause excitability especially in children. Do not take this product unless directed by a physician, if you have a breathing problem such as emphysema or chronic bronchitis, or if you have glaucoma or difficulty in urination due to enlargement of the prostate gland. May cause drowsiness; alcohol, sedatives and tranquilizers may increase the drowsiness effect. Avoid alcoholic beverages, and do not take this product if you are taking sedatives or tranquilizers without first consulting your physician. Use caution when driving a motor vehicle or operating machinery. As with any drug, if you are pregnant or nursing a baby, seek the advice of a health professional before using this product. Keep this and all drugs out of the reach of children. In case of accidental overdose, seek professional assistance or contact a Poison Control Center immediately.

Store at controlled room temperature 2°-30°C (36°-86°F).

Use by expiration date printed on package.

Protect from excessive moisture.

For better identification keep tablets in carton until used.
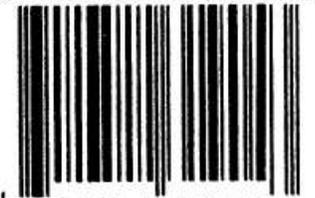
Made in U.S.A.

N3   111111   11111   8

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Example I

Do at least 30 minutes of exercise, like brisk walking, most days of the week.

Example J

The Dietary Guidelines for Americans recommends a half hour or more of moderate physical activity on most days, preferably every day. The activity can include brisk walking, calisthenics, home care, gardening, moderate sports exercise, and dancing.

****

Example K

Some evidence proves a fact directly, such as testimony of a witness who saw a jet plane flying across the sky. Some evidence proves a fact indirectly, such as testimony of a witness who saw only the white trail that jet planes often leave. This indirect evidence is sometimes referred to as "circumstantial evidence." In either instance, the witness's testimony is evidence that a jet plane flew across the sky.

Example L

Circumstantial evidence is evidence that, if found to be true, proves a fact from which an inference of the existence of another fact may be drawn. A factual inference is a deduction that may logically and reasonably be drawn from one or more facts established by the evidence.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

To find forms for the focus group discussions, I went to *USA.gov*, the USG's official web portal. The volume of information the USG publishes and disseminates makes it far too labor-intensive to collect all publicly available federal government forms. Indeed, the Government Printing Office confirmed that there is no comprehensive catalogue of such documents (31 Jan. 2014 email). Therefore, I used the forms available on *USA.gov* to create a spreadsheet of documents according the following criteria:

- For use by individuals (i.e., not forms used by corporations, government agencies, non-profits, etc.)

- Fewer than four pages, excluding instructions

- Published in English

- Publicly available

- Unclassified

I exported the documents on *USA.gov* that meet these criteria into an Excel spreadsheet. I then randomly selected five documents from the list. I did not use plain language as a criterion for this set of documents. However, as it turns out, two of the documents were produced or revised after the Plain Writing Act was implemented and are covered under its mandate.

I also randomly selected a set of five plain language documents from agencies' 2013 Plain Writing Act compliance reports (See section "2013 Plain Writing Act Compliance Reports" for a discussion of how the list of compliance reports was compiled). From the information in the compliance reports, I created a list of documents and websites that agencies indicate as examples of plain writing, again, randomly selecting five documents for use in the study packet. Because there are fewer plain language documents to draw from, I did not exclude examples that have

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

four or more pages in order to somewhat balance the sample size. Only one of the randomly

selected documents in this group has four or more pages, a National Institutes of Health

newsletter. In order to minimize the reading focus group participants would need to do, I selected

just one of the four pages from that document to include in the study packet (See Table 2-1),

drawing it from an unordered arrangement of the pages. I did not indicate in the study packet

which documents are written in plain language. I placed the *USA.gov* documents in the packet

first, in no particular order, and the plain language documents second, also in no particular order.

Table 2-1. List of Forms Used in Focus Groups and User Interviews			
Number	Form Title	Sponsoring Agency	Form Date
USA.gov Forms (Plain and Non-Plain)			
SSA-25	Certificate of Election for Reduced Spouse's Benefits	Social Security Administration	9/2012
21-0760	VA Benefits in Brief	Department of Veterans Affairs	8/2009
Publication 05-10041	The Appeals Process	Social Security Administration	1/2008
HA-520-US	Request for Review of Hearing Decision/Order	Social Security Administration	7/2011
I-192	Application for Advance Permission to Enter as Nonimmigrant	Department of Homeland Security/U.S. Citizenship and Immigration Services	4/2013
Plain Language Documents			
N/A	Website Home Page	U.S. Department of Commerce/U.S. Census Bureau	No Date; 12/2013 Screenshot
N/A	Web Publication: "Breast Pumps"	U.S. Food and Drug Administration	1/2013
N/A	Web Publication: "Pay your Taxes by Debit or Credit Card"	Internal Revenue Service	5/2013
N/A	Web Publication: "Health Care for People with Disabilities"	Centers for Disease Control	No Date; 12/2013 Screenshot
N/A	*NIH News in Health*	National Institutes of Health	11/2012

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

Thomas Greenbaum notes that warm-up discussions are helpful for getting people to start talking in the focus group setting, and building on data collection tools is an effective bridge (93). The questionnaire provided just such an opportunity to engage the focus group participants. In some cases, they helped one another with the questionnaire; in others, they raised issues about something related to the session or the overall purpose of the study. Once participants had completed their questionnaires, I asked them to talk about the forms they typically use. I then followed a protocol that is based on what Krueger and Casey identify as the characteristics of good questioning:

- Easy beginning

- Sequenced

- Transition from general to specific

- Well timed (42-43)

Other best practices I considered include the use of "what" and "how" questions instead of "why" questions, and asking uncued questions before cued questions (Krueger and Casey 62-63). After working through the discussion guide, focus group participants examined the documents in the study packet. I used a think-aloud protocol, asking participants to verbalize their impressions of the texts as they read through them and talk about what actions they would take based on the information in the documents.

Vivette Milson-Whyte cautions us about "ignoring sameness and difference while attempting to address difference in language use" (Loc. 2693). I learned this lesson firsthand. I had planned to conduct three study groups comprising 1) low-income individuals, 2) racial and ethnic minorities, and 3) linguistically diverse individuals. I initially approached potential EAL

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

participants as homogenous in their EAL status, assuming that this status would operate as a connection to encourage participation in a focus group. I was wrong. As a result, I was unable to organize a focus group based solely on linguistic diversity. After several failed attempts, both mine and those of the groups assisting me, I decided to conduct one-on-one interviews. As was the case with the federal writers in the study, people responded almost immediately to my interview requests, and I had more responses than time to conduct interviews. In the end, I met with four individuals, including a Persian speaker, a Russian speaker, a Spanish speaker, and a woman who speaks in Cajun Dialect. I followed the same protocol as I did with the focus groups and with the same conditions for participation.

2.2.3. 2013 Plain Writing Act Compliance Reports

In the final component of the study, I analyzed agencies' 2013 Plain Writing Act compliance reports. The Plain Writing Act's stated objective is to improve the federal government's accountability and effectiveness through communications that are clear, understandable, and usable (Sec. 2). The Act and its implementing guidance contain specific requirements for USG agencies, which must do the following:

- designate one or more Senior Officials for Plain Writing who will be responsible for overseeing the agency's implementation of the Act and this guidance;

- create a plain writing section of the agency website;

- communicate the Act's requirements to agency employees and train agency employees in plain writing;

- establish a process by which the agency will oversee its ongoing compliance with the Act's requirements; and

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

- publish an initial report on the plain writing section of the agency's website that describes

   the agency's plan for implementing the Act's requirements. (*OMB Final Guidance* 2)

Additionally, since October 13, 2011, agencies have been required to write all "new or

substantially revised" documents in plain language, and they had to begin publishing yearly

compliance reports by April 2012 (*OMB Final Guidance* 2-3). The Act describes "covered"

documents as paper and electronic publications needed to accomplish the following:

- Obtain benefits and services from the USG

- Comply with rules, regulations, and laws (e.g., file taxes)

- Get information about benefits, services, or compliance (Sec. 3 (2)(A) and (B)).

The survey, interviews, questionnaire, and focus groups described above were designed to

elicit information about writer and user understandings of plain language as well as their

perceptions of the accessibility, understandability, and usability of government documents,

including those written in plain language. Additionally, I used these tools to examine how both

producers and users respond (or not) to the Act, its mandates, and the documents it governs. An

analysis of agencies' Plain Writing Act compliance reports, on the other hand, provides an

institutional-level view of how the Act is interpreted and its provisions appropriated across the

USG. My goal for this prong of the study was to examine how USG agencies *publicly* represent

plain language and the Plain Writing Act compared to user and federal writer representations. I

also wanted to better understand institutional conventions, practices, and priorities as they are

reflected in these official plain language representations.

To obtain these data, I again turned to *USA.gov,* which contains a list of every federal

department and agency. This list was used as the basis for the compilation of organizations' plain

language compliance information. The Act applies to executive agencies as defined by 5 USC §

105, which means departments, government corporations, and independent government

organizations. In some cases, covered agencies' plain language pages meet the Act's requirement

that they be easy to find from the organization's homepage. In some instances, although an

organization has a plain language page, it is either not linked the homepage or difficult to find. If

an organization's plain language web page is not linked to its homepage, several search terms

were used to find it: *plain writing*, *plain language*, and *open government.*[8] This approach

sometimes yielded plain language information; in other cases, organizations just do not publish

any locatable plain language resources. After compiling the list of USG agencies'

implementation and Plain Writing Act compliance reports, I analyzed the 2013 submissions,

which numbered 29 as of February 2014.

2.3. Data Management

To manage my data, I used Dedoose, version 4.12.4, which is a web-based application

designed for qualitative mixed-methods research (*Dedoose.com*). I also used NVivo to perform

text queries. I transcribed, segmented, and coded the study data as outlined in the sections below.

My analysis was both quantitative and qualitative. I used the coding results to calculate the

frequency with which certain phenomena occur as well as to determine how these frequencies

are distributed across the datasets. I used the quantitative analysis to augment the qualitative

analysis, the close readings of the texts—transcripts and compliance reports—this study

generated.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

2.3.1. Transcription

After collecting the data, I prepared it for analysis. I first transcribed the focus group recordings, using the audio recordings for the bulk of the transcriptions and the video recordings to perform a quality check of the completed transcriptions. I also used the video recordings in order to note things the audio recording did not pick up or cannot convey, for example, body language. As Krueger and Casey point out, as much as 20% of content can be extralingual (139). In this case, the video recordings show cues that are relevant, but not apparent in the audio recordings. I indicate such information in the transcripts by brackets. As previously noted, any personally identifying information (location, organization, name, etc.) was redacted during the transcription process. The focus group and user interview transcripts are verbatim transcriptions, except where unintelligible or as otherwise indicated. Also, as noted above, federal writer interviews are glosses except for the statements in quotation marks, which are verbatim transcriptions of those utterances.

2.3.2. Segmentation

I segmented the data to make it usable for Dedoose and NVivo as well as to prepare it for coding. I first eliminated the "Yeah." "OK" types of sentences as well as all moderator questions and comments. I then segmented the texts (survey responses, interviews, focus group transcripts, and compliance reports) according to the following criteria:

- The basic unit of segmentation is the sentence-level utterance or writing.

- Where a sentence is logically linked to other sentences in a paragraph or response, those sentences are part of a single segment (e.g., "It's a good document. You know what I mean?").

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

- Texts are segmented by speaker.

After preparing the data, I had 357 segments from the qualitative survey questions and federal

writer interviews, 624 segments from the focus group and user interview transcripts, and 539

segments from the compliance reports, for a total of 1520 segments. I used this segmented data

for both manual analysis and as input for Dedoose and NVivo.

2.3.3. Coding

I coded all the segmented data, which I then used for the analyses in the chapters that follow.

Table 2-2 contains the "parent" codes I applied, along with their definitions and descriptions. I

designed the codes to identify instances in the texts where agencies, writers, and users comment

on the Plain Writing Act's goal to provide accessible, understandable, and usable documents to

the public. The codes also indicate how agencies, writers, and users talk about language

practices—and which language features they emphasize.[9] Additionally, I coded the texts for

comments that suggest power relationships as well as for process- and readability-related

comments. In the case of the latter two coding categories, both process and readability emerged

during the focus group sessions as important, even critical, components of participants'

conceptions of accessibility, understandability, and usability. Thus, while the other codes are a

priori codes—I developed them prior to coding—I added readability and process to the coding

schema during initial coding. I used simultaneous coding throughout the study; that is, I assigned

more than one code to the segmented data, when applicable.

Table 2-2. Parent Codes, Descriptions, and References		
Code	Description	Reference(s)
Language Features	Comment is about or relates to *how language is used, i.e., reading or writing habits or practices, attributes, or abilities* (e.g., "Writing has/does not	Spolsky describes language practices as the observable things people do, how they engage with

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

	have jargon, acronyms, big words, or obscure words"; "Some people have good/poor reading skills"; "That is incorrect usage of that word"; "The writing is plain, complicated, easy to understand, hard to understand,"; "I don't read things closely").	language, their linguistic habits, and the choices they make. For Spolsky, practices—along with beliefs and management—are the three interrelated elements that comprise language policy (*Language Management* Loc.119).
Accessibility	Comment is about ***how to find or get a document and/or finding necessary information within a document*** (e.g., "I download it"; "I go to a certain location to get it"; "I can't find the information I need (on the document, on a government website, etc.)"; "The language invites me to read more"; comments about Internet, phone, computer, etc.).	Enhanced accessibility is one of the goals of the Plain Writing Act, Executive Order 13563, and the proposed Plain Regulations Act. It is defined variously in the literature as the way language features make a text more engaging (Gillespie Myers, *Banishing Bureaucratese* 94), the way the design of a document makes information easier to locate (*Centerforplainlanguage.org*), and how documents themselves are easier to locate (Mazur).
Understandability	Comment is about or relates to the purpose of a document and ***whether and how well (or not) a person knows what a document is conveying or asking/requiring him or her to do, or the comment relates to whether an individual does/does not know what steps to take*** (e.g., "I know what I'm supposed to do"; "I don't understand"; "I need help figuring out what this means"; "First I would do A, then B, then C"; "I had to read this three times to figure it out"; "I need help finding information that's relevant to me").	Another goal of the Act is to make information more understandable for the public. Commentators usually link plain language to comprehension. PLAIN indicates that readers should be able to understand a text the first time they read it (*Plainlanguage.gov*). The Center for Plain Language notes that its measure for plain language is behavioral: the reader must be able to quickly and easily understand a text in order to appropriately use that information (*Centerforplainlanguge.org*).
Usability	Comment is about or relates to ***whether and how well (or not) a person is able to work with a document to achieve the document's purpose*** (e.g., given the individual's level of understanding, he or she can do what needs to be done; actions taken that suggest a form is more or less effective; "I am able to use this document to obtain benefits or services without help"; "I am unable to figure out how to submit this form"; "I can't read this font"; "Where am I supposed to sign?").	A third major goal of the Plain Writing Act is to make government information more usable. *Usability.gov* defines usability as "[h]ow effectively, efficiently and satisfactorily a user can interact with a user interface." Many plain language commentators highlight the importance of usability to plain language (See Stephens, *Plain*

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

		Language in Plain English, for example)
Readability	Comment is about ***how easy or difficult it is to read and/or understand a text*** or about ***things that affect the ability to read and/or understand a text*** (e.g., "This is readable"; "It's text you can understand in one reading"; "I can see the letters").	Readability is understood variously as a psycholinguistic concept (Hittleman 785), the ease with which a reader can work through a text (Stephens, *Plain Language in Plain English* 155), and typographic or linguistic (Bocchini et al. 21).
Process	Comment is about or relates to ***actions of people (including the writer and reader) and organizations that have something to do with a document*** (e.g., interaction with government offices and officials, experiences related to getting assistance with forms, statements about what happens to submitted forms, steps taken to fill out a form or obtain benefits.).	Cassels Johnson (Loc. 410) and McCarty (Loc. 291) both forward language policy as a process as well as considering it a textually based construct. Government forms are "texts in context" (MacCallum 15), and process is a part of the context in which official texts operate. Amy Devitt also notes that knowledge of the context, which includes the operations and structures of government in the case of bureaucratic plain language texts, is critical to understanding of the genre (46).
Power Relationships	Comment suggests ***a relationship in which an entity has control or authority over another and/or how much and/or what type of control or authority an entity has*** (e.g., relates to compliance or requirements; actor does something because he or she is or feels obligated to do so; relates to mechanisms that reinforce one behavior over another, someone has the authority to approve or deny benefits or services; "He can throw it in a stack of other forms"; "My benefits were cut"; "I was approved"; "There's nothing she can do"; "It's not fair"; "It's so complicated because they don't want me to apply for benefits"; "Convoluted language has been used in this document to prevent me from x, y, z").	Spolsky notes that language management consists of observable attempts by an entity that has authority (implicit or explicit) to effect desired language practices (*Language Management* Loc.119). Authority, thus, presumes that one individual or entity has power over another, and this power, according to Teun van Dijk is often institutionalized to allow for more control (*Discourse & Power* 66). Additionally, Devitt notes that genres—in this study, government forms—are "enmeshed in the complex relationships that are society, including such issues as power differentials and ideological identities" (34). Finally, McCarty argues that, fundamentally,

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

		language policy is "about [the] power relations that structure social-linguistic hierarchies" (Loc. 21).

In addition to the codes describe in Table 2-2**,** I assigned segments with attributes to indicate

tone or affect: positive, negative, neutral, or mixed/unclear.

In the second round of coding, I took two approaches. First, I coded for "versus," or

oppositional, relationships. Additionally, I wanted to get a more granular view of the parent

coding categories based on the themes that emerged during first-round coding. The power,

process, and language features categories were of particular interest. In round-two coding, then, I

read and coded for types of process-related comments (lack of time, assistance required, overall

system, etc.), manifestations of power relationships (standards, compliance, inequity, [dis]trust),

and specific language features. I also coded for oppositional relationships such as audience

versus writer/agency focus and good writing versus bad writing, among others. In those instances

where multiple sub-codes appear in the same excerpt, they roll up to the parent code as a single

occurrence. For example, Figure 1 is an excerpt that I coded for two language features: minimal

jargon (a sub-category of jargon or technical terms) and clear/clarity. Although minimal jargon
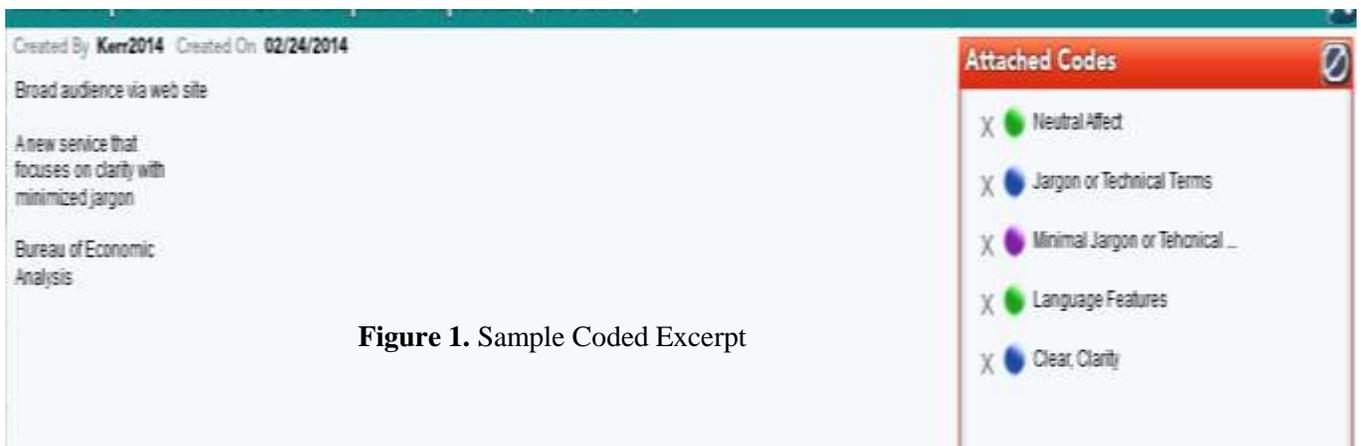
Figure 1. Sample Coded Excerpt

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

and clear/clarity are two separate sub-categories, they appear as a single occurrence of the language features code. This hierarchical approach allowed me to code at a granular level without skewing the overall results toward those parent codes that have multiple sub-codes or many occurrences of sub-codes.

2.3.4. Analysis

After completing the data segmentation and coding, I analyzed the data in two ways. I used Dedoose to help me identify and expand on themes and relationships as well as to quantify occurrences of certain characteristics across the datasets. I also used NVivo to run text queries for word frequencies and clustering relationships. I used traditional interpretive analytics, close readings of the texts, to further develop the themes, patterns, and relationships Dedoose and NVivo helped me to find as well as to provide context. I also discovered phenomena during the close readings that I then used Dedoose and NVivo to help explain. Chapters 3, 4, and 5 contain detailed discussions of these analyses.

2.4. Looking Ahead

In the following chapters, I examine the data generated by the methods outlined above, organizing the analyses around what plain bureaucratic language is and does. I use the findings to support my claim that—as is the case with any style, writing or otherwise—plain language is a matter of preference. Therefore, although plain language practices are valuable to users and producers of USG documents alike, plain writing as law is infeasible. I examine the writer participant data in Chapter 3. In Chapter 4, I turn to the 2013 plain writing compliance reports, and in Chapter 5, I analyze the texts generated from the user focus groups and interviews.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

Collectively, these data provide insights about what plain language means as well as how it

operates and to what ends in the bureaucratic context—and for whom.

Chapter 3. Plain Language: The Solution to "Bad" Bureaucratic Writing?

"In short, we do not need better leading indicators. We need bespoke indicators, tailored to the specific needs of governments, businesses, communities, and individuals—and we have the technology to provide them." (Karabell 99)

Bespoke: custom-made

3.1.   Introduction

Political scientist David Beetham points out that it is important to distinguish between those who administer public resources (government bureaucrats) and the administration that governs. Bureaucrats play a different role in governance (policy execution) than does the administration (policy formulation), so they exercise a different type of authority and represent a different orientation (10). The bureaucrats who carry out the mandates of the Plain Writing Act of 2010 operate in the space between the policymakers who identified a need for clearer government communication and the citizens the Act purports to benefit. Hence, this level of language policy offers unique and critical insights about what plain bureaucratic language is for those who produce official texts, how it operates, and how federal writers translate plain language from policy to operation.

This chapter contains a summary and analysis of the data I collected from current and former federal writers who participated in the study. Some of these bureaucrats are "mere implementers" (Cassels Johnson Loc. 1081) of the
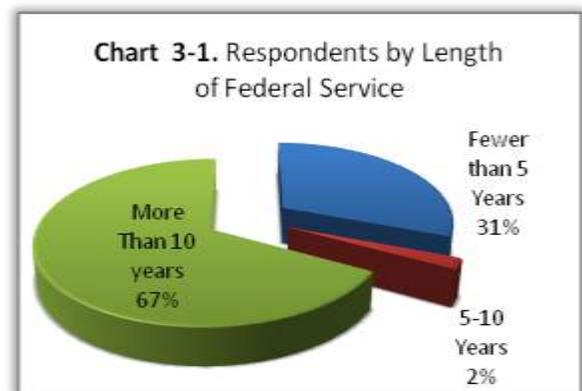
Chart 3-1. Respondents by Length of Federal Service

Fewer than 5 Years 31%

More Than 10 years 67%

5-10 Years 2%

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

Act, forwarding (or attempting to forward) the provisions of the Plain Writing Act as they are articulated in the text of the law and in the associated Office of Management and Budget implementing guidance. Others are arbiters who influence how the Act's requirements are interpreted, thus, operationalized, within their respective agencies. However, these interpretations are not always—or even mostly—consistent with the Act's stated objectives or the goals of its implementing guidance to make government information accessible, understandable, and usable for the public. Further complicating these appropriations of plain language policy is the fact that writers use accessibility, understandability, and usability in various ways, but at the same time, they are generally unable to provide useful measures of how their plain language-related efforts support these objectives.

As is the case with plain language commentators generally, the federal writers in the study represent plain language in various, sometimes conflicting, ways that reflect the tensions evident in plain language literature. Many of these writers, whether implicitly or

Chart 3-2. Respondents by Age

No Answer 4%
Under 35 17%
Over 50 50%
35-50 29%

explicitly, articulate plain writing as good writing in the tradition of the EAE standard, viewing it as a way to "fix" the "horribility" (WI-1) of bad bureaucratic writing. At the same time, these representations are mostly attentive to audience needs. Finally, this prong of the study reveals that while the Plain Language Act of 2010 does not appear to affect the work of the majority of writer participants, they are, nonetheless, generally supportive of plain language in principle.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee
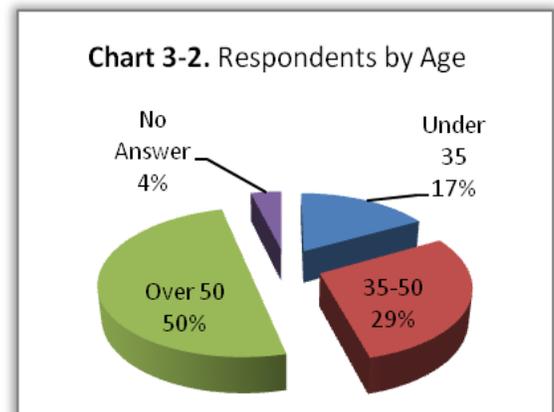
3.2. Writer Participant Demographics and Language Practices

The data I used in this analysis came from the 24 people who responded to the survey, five of whom also volunteered to participate in one-on-one interviews. A sixth person agreed to an interview after I approached him for assistance related to the study. The data collection instruments were designed to elicit what federal writers think about plain language and the Plain

Chart 3-3. Respondents by Languages
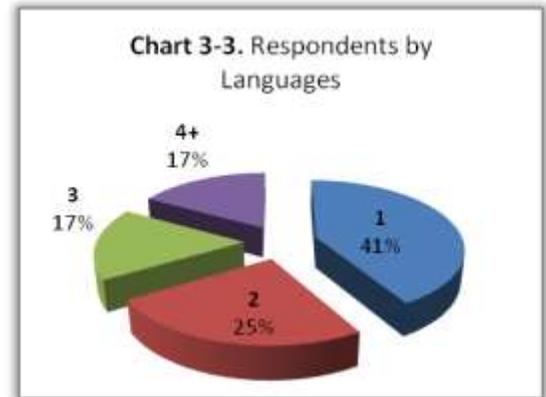
Writing Act of 2010. I wanted to know what good writing, clear writing, and plain writing are for them. I also wanted to know whether and how the Act is being implemented in their agencies and across the USG. Additionally, I asked questions about whether and how the Act affects the accessibility, understandability, and usability of the documents these federal writers and their agencies produce.

Of the six interviewees, five are currently federal employees, and one is a retired federal employee who works part-time as a contractor for his former agency. Five of the interviewees are male; one is female, and she is the only interviewee with five or fewer years of federal service (Chart 3-1). All interviewees have college degrees, and two have communication-related degrees. The survey respondents also all have college degrees, some with specializations in language or linguistics. SR-24 has a bachelor's degree in English literature, SR-13 has a degree in comparative literature, and SR-3 has one in comparative linguistics. Additionally, SR-7 has a Ph.D. in English. In fact, 71% of the survey respondents have graduate degrees in various subjects. There is more balance among survey respondents with respect to gender than there is in

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

the pool of interviewees: 54% are female, 42% are male.[10] Chart 3-2 shows how survey

respondents break down by age. In short, the sample set represents federal writers who are

predominantly older, college-educated professionals

with substantial federal government experience, and

they come from a range of agencies that are diverse in

size, mission, and scope.

Chart 3-4. Respondents by Race

   Although the dataset of survey respondents is not

statistically representative of the overall federal

workforce, the linguistic diversity of this small sample

is telling: more than 50% of respondents report that

they know more than one language (see Chart 3-3), some referencing various forms of English.

SR-18, for example, indicates Telugu as her "mother tongue":

> I am able to write at a professional and literary level in American English, as well as
> communicate through writing with people who speak a wide variety of various English
> dialects through American, British, and Indian communities—and am able to make myself
> understood regardless of the person to whom I am speaking.

Three federal writers in the study have a language other than English as their first language—

Telugu, French, and Russian—and all writer participants rate their first language proficiency as

either excellent (92%) or good (8%).

   While the survey responses reveal linguistic diversity with respect to both different forms

and dialects of English as well as languages other than English, there is relatively little ethnic

and racial diversity. Fully 80% of respondents identify as White (Chart 3-4), with only 4%

identifying as White and Hispanic or Latino. So while survey respondents have diverse language

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee
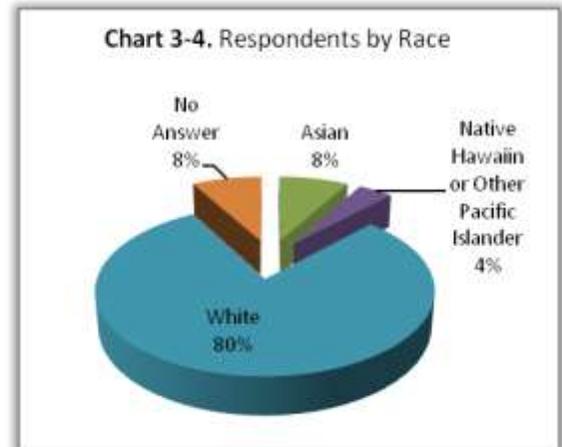
practices, they do not represent

diversity with respect to educational

level, race, or ethnicity. Nonetheless,

the sample set *is* representative of

the larger federal workforce in that it

reflects the "white collar"

demographics I outline in the

introduction: largely middle class and college educated.
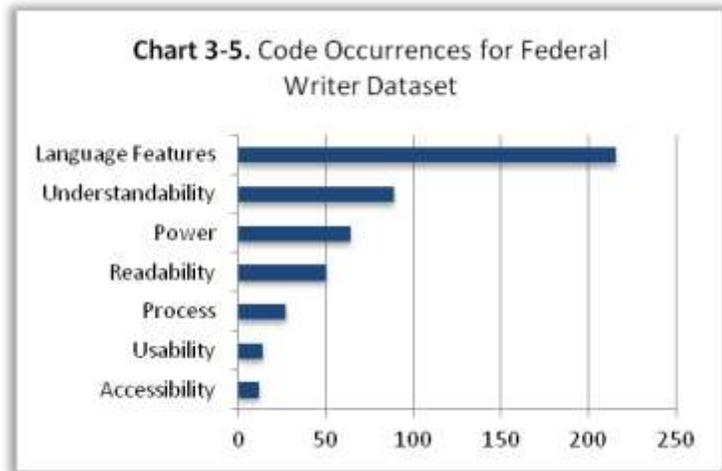
Additionally, given that 92% of respondents indicate they have taken a first-year writing

course in college and 67% say they have more than ten years of federal service (Chart 3-1), it is

clear that much of the sample set has significant experience with and exposure to EAE in the

federal government context. Indeed, 71% of survey respondents rate their English writing skills

as excellent, while 29% rate their English writing skills as good. In other words, *all* the survey

respondents express confidence in their work-related writing abilities, an attitude that is also

evident in the one-on-one interview narratives. For example, WI-1 indicates that he has long

provided writing instruction to organizations across the federal government. Similarly, WI-2 has

taught writing at a local university, and WI-4 provides plain writing tips to other agency

personnel. In fact, many of the federal writers in both the interviews and the survey responses

say they have had substantial workplace writing training and experience—whether as technical

or professional writers (SR-3 and SR-6), speechwriters (WI-2), or subject matter experts (WI-4,

SR-20, and SR-23).

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

3.3.   The Data

The surveys and interviews yielded 357 data segments, which I coded according to the criteria in Table 2-2. Chart 3-5 summarizes the breakdown of the "parent" codes I applied to the data generated from comments of federal writers in the sample set. It shows that language features (language characteristics and quality) get top billing (216 occurrences), followed by understandability (89 occurrences) and power (64 occurrences). More than any other coding category, writer participants emphasize language practices related to grammar, style, punctuation, and usage in their responses to the survey and interview questions. For example, SR-3 identifies "convoluted syntax, sloppy grammar, inconsistent, off topic, poorly organized, inappropriate language for intended audience" as the criteria for determining which documents should be written in plain language. SR-6 says plain writing uses active voice, avoids jargon and acronyms, and includes standard and accessible vocabulary, while for WI-2, bad bureaucratic
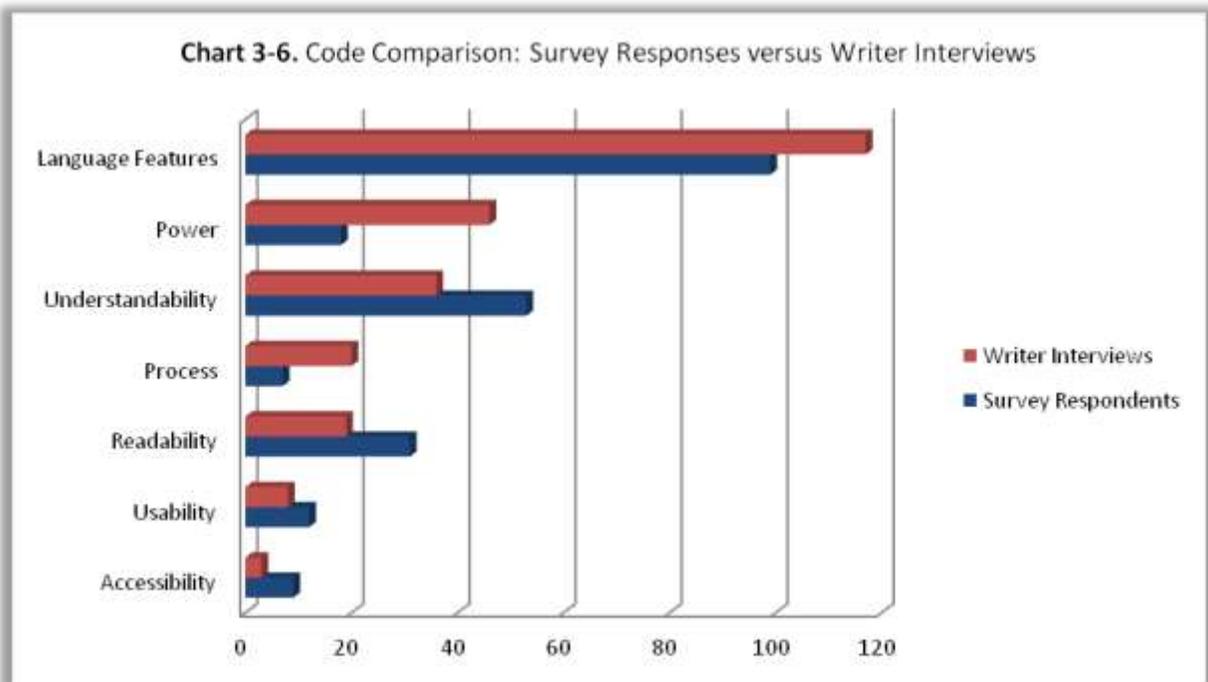
Chart 3-6. Code Comparison: Survey Responses versus Writer Interviews

Language Features
Power
Understandability
Process
Readability
Usability
Accessibility

■ Writer Interviews
■ Survey Respondents

0   20   40   60   80   100   120

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

writing lacks the basics—good grammar, organization, and style. As do most federal writers' answers to survey questions and interview comments, each of these remarks prioritizes language features over the other coding categories.

Some questions—in the survey in particular—asked respondents to describe certain types of writing; therefore, the predominance of references to language features correlates, at least to some degree, to the questions I asked. However, proportionately (See Chart 3-6), survey responses reference language features less often than do interview comments, suggesting that the survey's design is not a significant factor in the predominance of references to language features. Even with a less structured data collection approach, writers in the study focused disproportionately on language features.

The way writer participants talk about the Plain Writing Act's requirements helps to explain why they are more concerned with language features than with the Act's objectives of greater accessibility, understandability, and usability. At the same time, their statements reinforce the point that Spolsky, Shohamy, Cassels Johnson, and other scholars make about the importance of context to analyses of language policy. For the federal writers who took part in this study, that context consists of the processes that support the production of government texts, the power relationships that influence (and drive) these processes, and the language beliefs and practices that underpin the production of USG
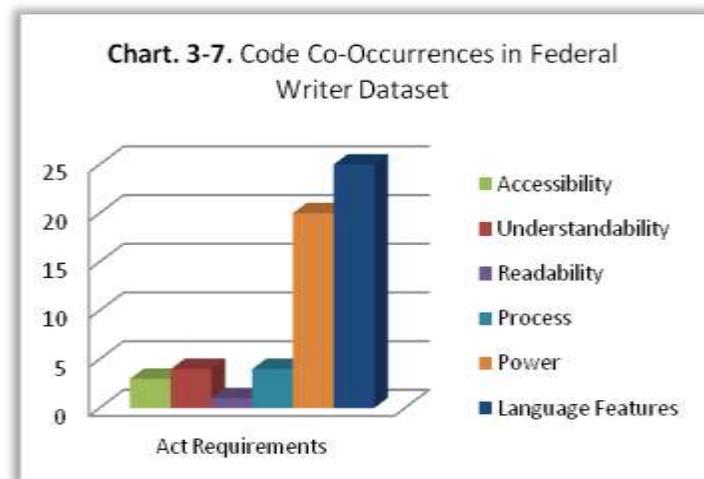
Chart. 3-7. Code Co-Occurrences in Federal Writer Dataset

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

texts.

When referencing the Plain Writing Act (as opposed to plain language generally), writer participants comment more often on the linguistic- and power-related implications of the Act than on its stated objectives of facilitating accessibility, understandability, and usability (See Chart 3-7). For example, in his discussion of the Act's requirements, WI-2 indicates that he leads a working group that is responsible for ensuring compliance with the Act; hence, he establishes the existence of two power relationships: his with the working group and the agency's (compliance) with the law. Similarly, SR-7 notes that she uses the Act for support when she makes the case to colleagues for edits to improve a document's clarity. She leverages the Act's authority (power) during her review of a document (process) to support the edits she suggests for greater clarity (language characteristics and quality). References to the Act's requirements include how they impact a writer: "There's nothing in the PWA that hinders my ability to effectively carry out my job functions" (SR-4). They also indicate how agencies respond to the Act's requirements. "My agency is not serious about making plain language the dominant style . . . . Very few people know about the Act" (SR-1). Writer participant comments even suggest that the public has an important role to play in plain language efforts. "The citizen must also bring something to the government's language table," argues SR-3, who also says, "Plain writing is absolutely essential in a working democracy."

3.4.   What Plain Bureaucratic Writing Is: The Federal Writer Perspective

Spolsky states that a complete study of language policy must take into account all three of its components: explicit policies such as the Plain Writing Act of 2010, language practices, and language beliefs (*Language Policy* Loc. 890). Similarly, for Cassels Johnson, the beliefs and

SR=Survey Respondent   FG=Focus Group Participant
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practices of individuals at various levels of language policy such as the Plain Writing Act affect

its implementation, hence, its impact. In the case of U.S. plain language policy, then, federal

writers' beliefs about plain language, what they think it is and does, are manifested in their

approaches to the Act's requirements and drive how they appropriate and implement (or not) the

principles of plain language in their work. I asked three questions in the survey to determine how

writer participants understand plain language:

    1) What are the characteristics of good writing?

    2) What are the characteristics of clear writing?

    3) What is plain writing?

I also asked interviewees to define plain writing as well as if they agree that plain writing is the

same thing as good writing. Table 3-1 below is a summary of their responses.

Table 3-1. Writer Participants on Good, Clear, and Plain Writing			
ID	**Good Writing**	**Clear Writing**	**Plain Writing**
SR-1	Clarity Conciseness Precision Attention to the needs of the audience	Good organization (important material up front) Accessible language (not jargon) Pronouns (address the reader directly) Active voice (passive shall not be used) Short sentences (yup) Short paragraphs and sections (ditto) Clear and informative headings (questions work well) Lists and tables aid understanding (the power tools of good technical writing)	Writing that your intended audience can understand in one reading.
SR-2	Clarity	No Answer	No Answer
SR-3	precise, clear, crisp, accessible, persuasive, and memorable	Simplicity, precision	Relevant to government, James Madison once said, "A popular government without popular information, or the means of acquiring it, is but a prologue to a farce or a tragedy; or, perhaps both." Plain writing is absolutely essential in a working democracy.
SR-4	The characteristics of	The characteristics of clear writing is	The characteristics of clear writing is

SR=Survey Respondent   FG=Focus Group Participant
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	good writing is a document that your reader can understand the first time they read it. It should also hold the attention of the reader. The reader should be able to clearly identify the actor and who or why they are doing the action.	when a document is written such that your reader can understand it the first time they read it. The reader should be able to clearly identify the actor and who or why they are doing the action	when a document is written such that your reader can understand it the first time they read it. The reader should be able to clearly identify the actor and who or why they are doing the action.
SR-5	In sum, the 5 "Cs": +Clear +Concise +Correct +Comprehensive +Concrete	Easy for the intended reader to understand the intended message and meaning. The intended audience reads a document once and understands the writer's purpose, main point, and argument or understands the writer's process or guidance that the reader should follow to achieve the reader's goal.	It is writing that the intended reader can understand the first time he/she reads the document and comprehend its intended meaning and message.
SR-6	In terms of business/workplace writing: effective at conveying an intended meaning to an intended audience in the clearest, most efficient way.	Uses prmarily [sic] active voice, employs logical transitions, minimizes jargon/acronyms (spells out acronyms when they're necessary), uses explanatory bullets/lists/charts in lieu of large paragraphs/long sentences where applicable, uses standard/accessible vocabulary, writes to/respects the intended reader/audience	Copied from previous narrative: Uses prmarily [sic] active voice, employs logical transitions, minimizes jargon/acronyms (spells out acronyms when they're necessary), uses explanatory bullets/lists/charts in lieu of large paragraphs/long sentences where applicable, uses standard/accessible vocabulary, writes to/respects the intended reader/audience
SR-7	Good writing effectively conveys its intended message to its audience.	Clear writing conveys its message effectively. It tends to use straightforward sentence constructions and the second person ("you".) It uses acronyms sparingly, avoids jargon, and uses bullets and lists to aid readers in understanding the structure of the communication.	Writing is plain if readers can comprehend it the first time they read it.
SR-8	Good writing is easily understood by the reader without requiring the reader to re-read it. It conveys information without the reader having to guess what the writer meant to say.	Clear writing can be understood on one reading. It does not require the reader to go back to reread a sentence or paragraph because he was unsure of what the writer was trying to say the first time. Clear writing should use straightforward, declarative sentences that vary in length. It should permit the reader to quickly get the writer's point	I think plain writing is writing that is quickly understood when read. It is not verbose or repetitive. It eschews jargon and tries to avoid, in the main, things like the overuse of the passive voice and unnecessary rhetorical flourishes.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

		without having to wade through jargon or through lengthy, convoluted sentences containing multiple subordinate clauses. Clear writing is writing that does not have to be translated to layman's terms.	
SR-9	Writing is difficult because there are some many different kinds of writing. It's not easy and takes lots of practice. Besides the obvious, mastering the fundamentals like good grammar, punctuation and spelling are a start. Good writing tells a point or story with accurate information. It should be well arranged, concise and cohesive. It should flow and be clear enough for the reader to understand the idea or point being made. Lastly, a good writer is creative in their presentation with elements of style.	Clear writing is presenting information that is easy for the reader to understand...short familiar words, more conversational than technical.	It is clear, concise, well-organized, and follows other best practices appropriate to the subject or field and intended audience.
SR-10	simple and to the point not wordy	No Answer	No Answer
SR-11	clear, concise, informative, & understandable uponC the first reading	clear, concise, informative, & understandable upon the first reading	Clear, concise, informative and understandable upon the first reading.
SR-12	simple straightforward language that meet the goal of the writing piece	Succinct clear short sentences	No Answer
SR-13	clear, concise, targeted to audience	shorter sentences, active voice, less adjectives/adverbs, minimal parentheticals, lack of jargon, acronyms, buzzwords	successfully communicates a message to the intended audience
SR-14	Clarity and moves us to action	The organization I supports has scientific policies which I do not understand but it clear that they are trying to do "clear writing" although they are very technical. They are using	No Answer

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		more graphics and try and do step by step procedures. Clear writing means you understand what is being said and what needs to be done, what the action is!	
SR-15	short, simple easy to understand sentences and paragraphs	easy to understand (enough said!)	easy to understand (enough said!)
SR-16	Convey messages precisely with plain language.	Simple, concise, and precise.	Simple and easy understandable.
SR-17	Complete, easy to understand and to the point.	When there are no questions after reading the information.	No sophisticated words are used.
SR-18	Proper grammar, use of idiom within reason, well-edited prose such that no word is wasted, consistent use of the active voice when applicable.	Follow the guidelines as stated in the Chicago Manual Style... and the following: Proper grammar, use of idiom within reason, well-edited prose such that no word is wasted, consistent use of the active voice when applicable.	No Answer
SR-19	Clear, succinct, comprehensive without being verbose.	No jargon, no acronyms, clear, concise and standard English, accurate punctuation, no spelling errors or confusing syntax.	No Answer
SR-20	Saying as much as possible with fewer words; balancing this with reaching your audiences optimum level of "flow"; flow could be attention, intellect, curiosity, or any other personal need.	Saying as much as possible with fewer words with respect to the target audience	Precise and accurate writing that reaches the target audience with the most impact.
SR-21	clear thoughts, succinct structure and strong grammar	No Answer	I would consider plain writing devoid of jargon, phrases, or concepts that only someone deeply involved in a particular subject would know. Lawyers, for instance, would refrain from using the terms only in the manner used for discussion of specific topics (e.g. "custody" has different meanings based on whether you are talking criminal justice, family law and the like). In plain writing, these concepts would be spelled out first before being used extensively. Also, sentence complexity would be

SR=Survey Respondent   FG=Focus Group Participant
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			limited
SR-22	Good writing should be clear and concise and avoid overly complex terms and sentence structures.	Clear writing uses straightforward sentence structures, formatting clues (e.g. bullets) to help readers see the structure, and simple words.	Plain writing is something that everyone can understand easily.
SR-23	Clear, concise, appropriately descriptive, and properly written documents of the length necessary to accurately convey a concept or event so that the intended audience is able to fully grasp the intent of the material without confusion or misinterpretation.	I refer back to good writing, as I feel good writing must be clear and clear writing SHOULD be good.	It's good writing - Clear, concise, appropriately descriptive, and properly written documents of the length necessary to accurately convey a concept or event so that the intended audience is able to fully grasp the intent of the material without confusion or misinterpretation.
SR-24	Engaging the reader. Good flow. Descriptive, but in a way that is short and to the point.	Using vocabulary that your audience will understand. Avoiding redundancy.	To me? Writing that is not at all superfluous. And easy to read, both in terms of simple vocabulary and in sentence structure that is unhindered by incorrect grammar.

ID	What is plain writing?	Is plain writing the same as good writing?
WI-1	Standard one-line definition: "material that your intended audience can understand in 1 reading. They don't have to go back and read it 2, 3, 4 times to understand what you're trying to say. It's readily apparent."	Yes
WI-2	"It's basically speaking to an audience in its own terms." When you communicate with audience, they understand message, meaning, and intent first time they read it.	Not discussed.
WI-3	"English prose that's written to maximize the understandability of what the writer has to say in the most direct way and in the fewest number of words while maintaining clarity."	Yes, unless trying deliberately to be confusing and think that somebody might find it fun to figure it out. No point. That's [complicated writing] not good writing.
WI-4	It's very simple. "It's writing in which the reader can understand what the author is intending to say the first time without re-reading it 15 times to figure out who's doing what." More detailed: get rid of "lazy verbs," verbs ending in ing. Forces writer to point out actor in sentence and, therefore, point out end result and who is involved. It's naming players and who's doing the action of what	Beginning more and more to think they're one and the same because if writing not quickly understood and absorbed by reader—useless document.

SR=Survey Respondent   FG=Focus Group Participant
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	play.	
WI-5	Not discussed.	Not discussed.
WI-6	"We want users to find what they need, understand what they find, and use what they find to meet their need." Only way to add to that definition is by what is stressed: simple and direct communication in work products. Not writing a novel. Purpose up front, not buried in a 6-page letter. What's plain depends on audience. Go for simple term when possible. Use versus utilize. Avoid bureaucratese. Avoid being too defensive. Avoid passive tone to deflect responsibility. . . huge for federal government. "It has been decided that . . ." Give it a face. Be direct. Simple and direct. Terms that everyone can understand.	Good writing requires a definition. Some good fiction that's not plain. But in office, it's direct communication. Hence, in USG office, plain language principles are very effective, and in that realm, plain writing would constitute good writing, which maybe not the case in fiction realm.

Federal writers articulate plain language in the bureaucratic context as both enabling (focused on the needs of the reader(s)) and restrictive (good writing that may be limited to the EAE standard). Most link good writing to clarity in written communication, and they often consider plain writing as good or clear writing. SR-23 connects all three, saying plain writing is clear and concise text that the audience can understand and that "good writing must be clear and clear writing SHOULD be good." Several also characterize plain writing as good writing in the sense that it is grammatically correct. SR-5 describes plain writing as clear, concise, correct, comprehensive, and concrete, and SR-21 says plain writing has "strong grammar." Others describe good writing, clear writing, and plain writing as being well organized (SR-1), simple (SR-12), and easy to understand (SR-15). SR-14 explains that "good writing moves us to action," and SR-7 describes plain writing as writing that successfully communicates a message. For some, it is also the means by which the USG can counter bad bureaucratic writing. Only WI-6 points out that plain language still needs to be defined, a statement that, together with these various representations of plain language, echoes the tensions evident in plain language literature

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generally. Plain writing may be a way for federal writers to focus on the needs of the audience and make information more understandable, but for most, it is a *quality* of writing.

The comments in Table 3-1 help to explain the predominance of references to language features: these formulations of plain, good, and clear writing are premised chiefly on writer action rather than on reader interpretation. Put another way, writers' remarks emphasize form and the steps *writers* must take to achieve it instead of function, that is, what plain writing does in the bureaucratic context to influence the textual government-citizen interaction and to what end. Thus, language features foreground many of the discussions about the Act, plain language, and writing generally. To be sure, 19 of the 24 survey respondents describe good writing in terms of clarity, specific language practices (use of active voice, correct grammar, short words), or a combination of both. This representation emplaces the *writer* as the arbiter of good writing; if he or she minimizes jargon and writes with clarity, the text qualifies as good writing. The remaining survey respondents, however, emphasize the audience's ability to understand a text. Good writing here depends on the reader and his or her ability to comprehend the writer's intended meaning and use the information appropriately. The same pattern is evident in interviewee representations of plain writing. On the one hand, WI-1 describes it as writing the reader can understand in just one reading, thus, emphasizing user interaction with the text. The degree to which a text is plain is determined by the user's ability to access, understand, and use it. On the other hand, he agrees that there is a one-to-one correlation between good writing and plain writing, both of which presume grammatical correctness, proper punctuation, and appropriate usage. Here, it is the writer's actions (e.g., writing grammatically) that determine whether the text is plainly and well written, not the reader's ability to understand it.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

Round-two coding provides additional insights about what plain writing is for the federal

writers who participated in the study, specifically, their affective orientation toward plain

language and the Plain Writing Act (it is useful; it

is not useful) and its emphasis in terms of

audience or agency/writer. Approximately 55%

of segments highlight audience, while 45% relate

to agency or writer considerations. This

breakdown, of course, suggests that with respect

to plain language, writer participants prioritize

Chart 3-8. Agency/Writer versus Audience by Affect
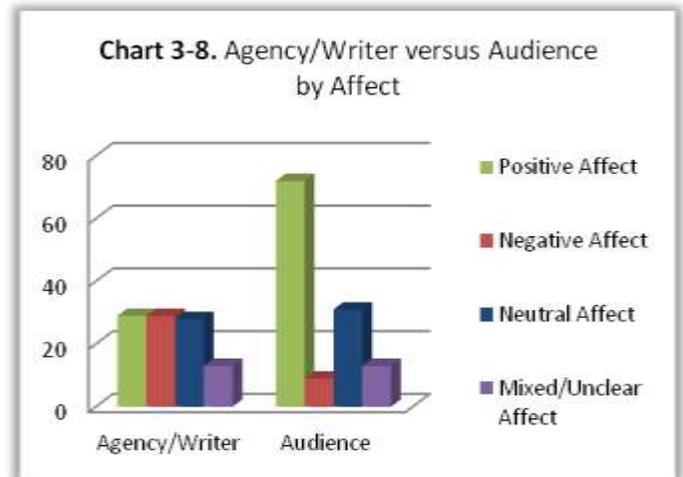
audience concerns slightly more than their own or their agencies'. Further, a crosshatch of the

agency/writer versus audience codes against affect (Chart 3-8) shows that affect is quite evenly

distributed across the segments that reference agencies or writers. However, the segments that

emphasize audience have positive affect almost three times more often than they have negative

affect.

These data are important to this analysis in several respects. First, they show the extent to

which the federal writers in this study conceive of plain writing as audience-centric writing and

the Act as a mechanism that supports the need of readers. Writer comments frequently reference

audience, and by quantifying these references, it is easy to see how just how prevalent they are

across the dataset. Moreover, the positive affect associated with references to audience shows

that the federal writers in the study view plain writing and the Act as value added to users of

USG documents. The absence of a pattern in affect attributes related to writers and agencies, on

the other hand, reflects a tension that is apparent in plain language literature as well. Plain

writing benefits users, who recognize its value (See Chapter 5), but there are problems with the Act's implementation as well as challenges to what it can actually do. Writers, unlike the 2013 compliance reports (See Chapter 4), are willing to raise these issues; hence, the tone of their comments varies accordingly.

3.5.   What Plain Language Does: The Federal Writer Level

Writer participant comments establish plain bureaucratic writing as writing that is clear, good, and in some representations, consistent with the EAE standard. These characterizations of plain language notwithstanding, the Plain Writing Act does little to forward the USG plain language policy agenda at the federal writer level. Many of the study participants, including those who write "covered" documents, i.e., public-facing texts, are unaware of the Act and its provisions. Despite their high level of knowledge about and experience with writing for the USG, only 50% of survey respondents indicate that they are aware of the Plain Writing Act of
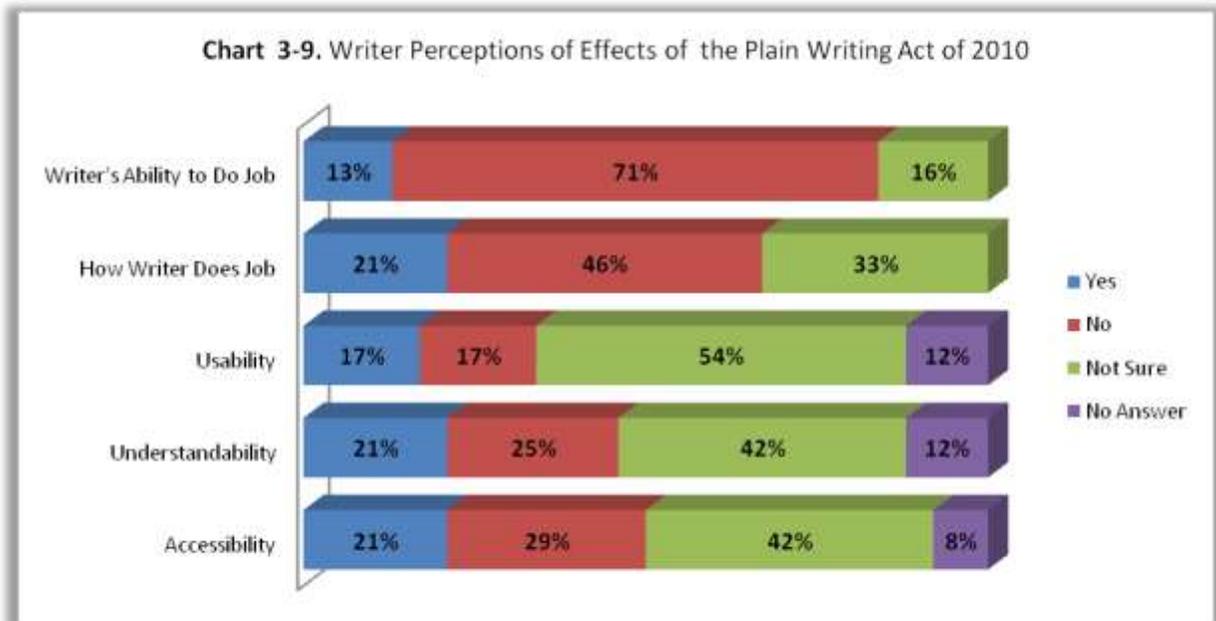
Chart 3-9. Writer Perceptions of Effects of the Plain Writing Act of 2010

	Yes	No	Not Sure	No Answer
Writer's Ability to Do Job	13%	71%	16%	
How Writer Does Job	21%	46%	33%	
Usability	17%	17%	54%	12%
Understandability	21%	25%	42%	12%
Accessibility	21%	29%	42%	8%

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

2010,[11] and just 29% know about other federal plain language mandates (Executive Order 13563, Clinton's June 1998 memorandum on plain language in government writing, etc.). As SR-18 puts it, "I don't actually know what the PWA is (and clearly I should)." Interviewees have better awareness of the Act—they have all at least heard of it—although WI-3 and WI-5 have little knowledge about the Act's specific requirements, stated goals, or implementation in their own or other agencies.

The news is not any better when it comes to how these federal writers perceive the Act's impact on their work. By and large, writer participants say they do not know if the Plain Writing Act of 2010 affects the accessibility, understandability, and usability of their documents, or they disagree that it has had any impact in this regard. Additionally, most writer participants cannot say whether the Act has affected *how* they do their jobs or disagree that it has. Finally, the federal writers who participated in the study generally agree that the Act's requirements have not affected their *ability* to do their jobs. As Chart 3-9 shows, just 21% of survey respondents say the Act impacts how they do their jobs, while only 13% say it affects their ability to do their jobs. SR-20 points out that neither the Act nor its requirements have ever been raised with respect to the documents he writes; therefore, he cannot say whether or how this mandate affects his work. Similarly, SR-23 indicates that the Act has had no impact on his work: "Again, no advertising, no instructions to apply the principles and certainly no agency mandate." Even some interviewees who strongly support the Act and plain writing say that it has had negligible impact on their work. For these federal writers—WI-1, WI-2, and WI-3, for example—the Plain Writing Act simply formalizes the plain language approach that has long been part of their language practices.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

There are, however, some writers in the sample set who indicate that the Act has affected the way they work. At total of 29% of survey respondents indicate that they have written or revised documents according to the Act's mandates. SR-3 suggests that the Act "has raised awareness of the importance of plain language in government documents," and SR-5 notes that the Act "created opportunity for me to pursue my passion for plain language and quality writing and to lead an initiative at [agency redacted]." WI-6 indicates that his agency takes the Act seriously, despite the fact that compliance with its requirements is neither tracked nor enforced. He notes that his agency has been very cooperative and seems to be an "early adopter" of the plain language program. SR-7 says she uses the Act to make the case with colleagues for clearer writing and adds, "I do my job better because the PWA helps to keep the focus on writing plainly." She also indicates that the Act has raised awareness about the importance of writing well and plainly and notes that her agency now publishes clearer documents as a result of this enhanced awareness. And although he is unfamiliar with the Act and its requirements, SR-20 points out that it is much needed in his sector.

3.5.1. Accessibility

Just as writer participant representations of plain language and the Act's impact on their work are mixed, so too are their comments about the Act's efficacy. Their responses do little to clarify whether, how, or to what extent their use of plain language makes "covered" documents more accessible, understandable, or usable. PLAIN, which the Office of Management and Budget named as the "official interagency working group designated to assist in issuing plain writing guidance" (*OMB Final Guidance* 3), states that documents are in plain language if the intended audience can find, understand, and use information toward a desired end (*Plainlanguage.gov*).

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

However, only 21% of survey respondents say that the Act affects the accessibility of the documents they produce. Indeed, SR-4 goes so far as to say, "[the] PWA has nothing to do with accessibility." SR-8 also indicates that the Act has not affected the accessibility of documents he produces, but says it is because he has long written in the plain style. SR-6, on the other hand, considers the Act's requirements when writing or editing government documents and says that by doing so, her documents are more accessible for her target audience.

3.5.2. Understandability

Writer participants may be wont to default to language characteristics or the qualities of writing in their discussions about plain language and the Plain Writing Act of 2010 (Refer to Chart 3-5 above), but their comments also indicate a high degree of concern with understandability; there are 89 segments in the dataset that reference user comprehension. In comparison, just 12 comments mention accessibility, and only ten raise the issue of usability. Still, only 21% of survey respondents agree that the Act makes their written communications more understandable. SR-1 "hope[s] it is empowering some who want to write more clearly, but I have no evidence of this," and SR-23 says that it is not apparent whether the Act has had an impact on the understandability of his documents. SR-4, however, believes the Act "increases knowledge because the actors are clearly spelled out," and SR-6 agrees that her documents are more understandable because of the Act. Interviewees also emphasize understandability in their comments about plain language and the Plain Writing Act; however, they generally frame it as a goal rather than as a measurable result of their own plain language approaches. WI-6 points out that part of the problem in determining whether understandability improves when federal writers apply plain language principles as mandated by the Act is that there is very little public feedback,

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a frustration that WI-1 also shares. Such comments reinforce that these federal writers recognize the need to produce understandable government documents but are skeptical of whether or how the Plain Writing Act helps them to do so.

3.5.3. Usability

Finally, just 17% of survey respondents say that the Act affects the usability of the documents they produce. SR-6 says "clearer, more accessible documents are more frequently used documents," while SR-19 frames enhanced usability in terms of the readability of documents she produces under the Plain Writing Act. SR-1 notes that the Act provides support for the things he has always done to enhance the usability of texts, and SR-8 also views the Act as "reaffirmation of what I've been doing" in this regard. Additionally, WI-6 points out that the Act is a good reminder for writers to be more reflective about writing, indicating that, as a result, his organization's collective writing is better, more effective, and usable. On the other hand, most survey responses indicate that writers cannot determine if the Act impacts the usability of the documents they produce. WI-4's comments are consistent with these responses; she notes that her organization still has work to do in terms of making information more usable in the plain language context.

3.5.4. Why Plain Language Does Not Achieve the Act's Objectives: Writer Views

Interview comments and the survey's narrative responses help to explain some of the inconsistencies in assessments of the Act's efficacy. WI-4, for example, worries that plain language has "fallen dead in the water" because it does not sound formal enough. "We're just so far from there," she explains. "I say the two words *plain language*, and people look still look at me cross-eyed." Although she has high praise for the plain language program manager in her

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agency, she says, "It's [plain language] all lip service at this point." A number of writer participants point to institutional impediments as the problem. SR-3 and SR-11, for example, indicate that they have not been required to meet the Act's mandates, and WI-3 notes that in his agency, plain language is not high on the department head's "scale of values." WI-4 says there are managers in her agency who support plain language, but many still do not. As a result, a writer may draft a document with the Office of Management and Budget guidance in mind; however, managers will often return it with edits that eliminate the document's plain language features. WI-1 notes that the Office of Management and Budget is part of the problem. He argues that agencies will not take plain language seriously until its Office of Information and Regulatory Affairs begins to turn back regulations (although not covered under the Act) that are not clearly written.

WI-2 echoes this frustration, pointing out the need for a cultural shift that rewards people for plain writing and institutionalizes such a shift by way of revised employee performance evaluation approaches that require the use of plain language. He notes that the progress his agency has made in prioritizing plain language—he leads a large agency working group—has more to do with his expertise, advocacy, and personal relationships with the organization's decision makers than with the Act. Like WI-1 and WI-2, WI-6 agrees that the Act is not enforced. It has no teeth, he states, no mechanisms to ensure that agencies are complying with its requirements. Additionally, no one is asking about it. Agencies are directed to make plain language a priority, he says, but no one monitors whether they are doing so. SR-1 points out that his agency "is not serious about making plain language the dominant style . . . there is still a lot of garbage getting through." Similarly, SR-13 says she attended one training session on the Act,

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

but she adds that it has not been enforced in any of the offices in which she has worked. Finally, SR-1 points out that the Paperwork Reduction Act is part of the problem as well because it constrains agencies by making it difficult for them to survey users regarding usability.[12]

Writer participants raise other challenges related to the Act's implementation. WI-5, for example, says the guidelines on his agency's website contradict the writing style of the organization's typical functional expert, and he questions how these experts would respond to "other elements of government telling them to write differently since the self-perception is that they write so well regardless." SR-4, however, argues that federal writers have a comfort level with "gobbledy gook" because they have been using it for so long, adding that many people do not feel plain writing is sufficiently formal for government documents. She advises that the question I really needed to ask in the survey is whether "you are allowed to write in plain language per the PWA at your current job." Such statements reinforce that, as is the case with plain language representations generally, writer participants also do not have a single view of how effectively the Act has been implemented across the USG; the reasons for problems related to its implementation; or the extent to which it has impacted their work and the accessibility, understandability, and usability of the documents they produce for the public.

From the perspective of the writers in this study, bureaucratic writing must be understandable, but the Plain Writing Act of 2010 has had little appreciable impact on the understandability of USG texts. Study writers privilege comprehension over accessibility and usability—and to no small degree. Although definitions of plain language in the literature often give equal weight to all three components (See Cheek, "Defining Plain Language" 5, for example, or *Plainlanguage.gov*), the writers in the study express little concern about either

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accessibility or usability. This analysis also exposes a critical fault line in the USG's plain language program. The prevalence of references to comprehension substantiates that writer participants are very much attuned to the need for making official texts more understandable for readers. However, the low marks they give the Act for its contributions to and support of efforts toward enhanced understandability suggest that it is not performing the work it says it will.

3.5.5. Assessing the Act's Impact: No Reliable Measures

Interview and survey responses suggest different reasons for the gap between the Act's objectives and writers' actions and perceptions of its impact on their job-related efforts. As noted above, some writers say the Act only reaffirms what they have always done to make their documents accessible, understandable, and usable (SR-8). Others (SR-23) suggest that plain writing should increase accessibility, understandability, and usability but cannot say for sure whether or to what extent this might be the case for the documents their organizations produce. Part of the problem is that there is a general lack of clearly defined benchmarks to help federal writers and their agencies determine whether and to what extent plain language affects the documents they generate or their impact on users. Instead, the study participants use various approaches to determine how their documents stack up against the objectives of the Plain Writing Act and meet user requirements. SR-7 measures the efficacy of her plain language approach by relying on personal judgment. She is skeptical about numerical measures such as word length or readability levels because of their subjective nature. "A short sentence with passive voice, vague pronouns, and poor verbs," she says, "can be opaque, and a long sentence with complex words can be clear." SR-5 uses audience response to measure how accessible, understandable, and usable his writing is, and he points out that the Act "has had little impact on

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that measurement because I have so much previous experience in applying plain language principles." His metric is the approval of his "ultimate customer," his management; however, he says his agency is developing measures to gauge how well it is complying with the Act. SR-8 takes a similar position, noting that the policy in his office is that no document is finalized until at least one supervisor has reviewed it. Thus, SR-8 sees the review and clearance process as a basic measure, as does SR-14 and SR-19. SR-3 states that because plain writing is neither simple nor easy, it is difficult to define criteria to assess impact. "Reader and SME [subject matter expert] reactions, comprehension, and engagement are my best guides," he says. Finally, SR-4 notes the report cards the Center for Plain Language issues are the only measure she knows of for her agency.[13]

Other respondents, however, indicate that either they are unaware of or their agencies do not have metrics for determining the accessibility, understandability, and usability of government documents or agencies' compliance with the Act. SR-6 notes the lack of "quantifiable metrics," and SR-13 indicates that she is unaware of any metrics. SR-23 has a slightly different take on metrics:

> In reality, this is a constant effort—information has no value if it is not available and understandable. The primary metric was determining if the specific desired outcome was being achieved. If not, the first likely culprit was inadequate communication, written or verbal . . . . Actions or opinions contrary to guidance indicated a lack of information or a lack of understanding of that information, each requiring its own actions to address.

For SR-23, then, usability, although not quantifiable in the sense he is referencing it, assumes information is accessible and is the best measure of a text's understandability.

Collectively, these writer participant comments about metrics—or the lack thereof—suggest both inconsistency (metrics vary from individual to individual and organization to organization)

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and subjectivity (effectiveness is in the eyes of the beholder). At the same time, the statements illustrate the problem Piper says is inevitable without a well-defined understanding of what constitutes plain language. If it is not clear what plain language is, says Piper, how can compliance with it be measured (30)? Given the lack of reliable, commonly accepted metrics, it is unsurprising, then, that the federal writers in this sample set question the effectiveness of the Act and agency responses to its mandates. Without such metrics, the USG cannot *meaningfully* measure agency compliance with the Plain Writing Act or the impact of plain language on the accessibility, understandability, and usability of the documents federal government organizations produce.

3.6. Summarizing the Findings and Looking Ahead

Writer participants do little to forward "a" definition of plain bureaucratic language. On the contrary, collectively, the narratives and coded data generated by this part of the study reveal that writer participants have various beliefs about what plain bureaucratic writing is and does. These beliefs are manifested in the diverse ways writer participants interact with, appropriate, and forward plain language policy. There are differences in how the study's writers view the Plain Writing Act of 2010 and its requirements, implementation, impact, and efficacy. What constitutes plain may be different from audience to audience (*Plainlanguage.gov*), but this part of the study shows that what is plain for federal writers is more or less tied to language characteristics and qualities.

Interview and survey response data also highlight the gap between the Act's stated objectives and the work it is actually doing to help writers (or not) perform their job-related writing duties. Writer participants challenge the Act's capability to facilitate better accessibility,

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understandability, and usability of USG-generated documents, although most agree that plain language solves the problem of the "bad" writing exemplified by texts written in traditional bureaucratic style. Plain language may be a useful linguistic strategy from the writer participant perspective, but as a policy, its value is questionable, and its efficacy is impossible to determine without stable definitions and metrics. As the following chapters will show, there are competing ideas about what plain language and the Plain Writing Act are and do at the user and federal agency levels that diverge from writer conceptions in important ways. Similarly, what constitutes accessibility, understandability, and usability varies across all policy levels, affecting the USG's ability to determine the extent to which plain bureaucratic language responds to the problems associated with traditional government writing.

Chapter 4. Federal Agency Plain Writing Act of 2010 Compliance Reports

"Not since 2004, have we collected any data on the number of employees trained in plain language" (Food and Drug Administration, *2013 Plain Writing Compliance Report* 2).

4.1.   Introduction

In his analysis of institutional discourse, Teun van Dijk notes that institutional elements—hierarchies and authority, for example—are "enacted in commands, orders, instructions and other directives," e.g., the Plain Writing Act of 2010, and can also be "expressed by representation," e.g., agency personnel (52). Both the writers in this study and USG agencies' Plain Writing Compliance Reports (compliance reports) represent their organizations in the sense van Dijk describes. However, van Dijk also points out that "institutional texts" do not necessarily represent an organization the same way an employee or official might, in part, because texts are often "explicitly programmed or planned and, therefore, better controlled" (54). Similarly, for Shohamy, language policy is not just found in the policy document, e.g., the Plain Writing Act or agency compliance reports. Rather, it is found in the mechanisms that "perpetuate language practices" (Loc. 1305). Thus, an examination of how writer participant views on the Act and its implementation diverge from and converge with institutional representations vis-à-vis the compliance reports helps to show what plain writing means and does in the broader USG plain language policy context.

In Chapter 3, I show that the federal writers who participated in this study do not all understand plain language the same way but generally represent it as the solution to "bad" government writing, that is, traditional bureaucratic writing. They talk about the Act and plain language primarily in terms of language qualities and characteristics as well as more positively

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overall than negatively. In this chapter, I use agency compliance reports to show that plain USG

plain language policy is forwarded at the institutional level primarily as a function of language

characteristics and qualities as well, not by whether or how it makes documents more accessible,

understandable, or usable. Plain bureaucratic writing is also often represented as clear and

concise writing and articulated as good writing in the EAE tradition—although usually

implicitly. Finally, the compliance reports focus primarily on the Plain Writing Act's

requirements, not its objectives, demonstrating in the process that the use of plain language

techniques is not an effective measure of the Act's efficacy or plain writing's value.

4.2.   The Data

The Plain Writing Act of 2010 requires all USG agencies, as defined by U.S. Code, Title 5,

Section 105, to take the following steps:

1) Designate one or more senior official to oversee the implementation of the Act within the

   agency;

2) Establish a process for overseeing agency implementation of and compliance with the

   Act;

3) Ensure that agency personnel are aware of Act requirements;

4) Provide plain writing training to agency personnel;

5) Create a plain language section on the agency website that is accessible from the

   homepage; and

6) Develop mechanisms, including point(s) of contact, for public comments related to the

   agency's plain language efforts.

Using the approach detailed in Chapter 2, I found a total of 29 compliance reports. The

websites of 377 USG organizations were surveyed as part of this study, of which only 107 have

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plain language sections that are easy to find from the main website's homepage.[14] Of these 107

organizations, 27 do not have their own plain writing page; rather, they link to their parent

agency's plain writing page. Additionally, just 52 organizations on the list have publicly

available compliance reports for any year, as of February 2014, although many of the

organizations on the list are included in their parent agencies' compliance reports. There are also

some organizations that published their own compliance reports even though they are part of

another agency, the Census Bureau, for example, which is a Department of Commerce

component. There were agencies that submitted compliance reports in 2012 but did not submit

them in 2013 and vice versa. There were also agencies that submitted their first report in the

2013 cycle, and only six agencies have publicly available compliance reports for all three

years—2011, 2012, and 2013. Table 4-1 below summarizes plain language compliance report

submissions by USG agencies.

Table 4-1. USG Agency Plain Writing Compliance Reports by Year			
Agency	2011	2012	2013
U.S. Agency for International Development	✓	✓	
AmeriCorps*	✓	✓	
National Archives and Records Administration	✓	✓	
Arms Control and International Security*	✓		
Consumer Financial Protection Bureau		✓	✓
Bureau of the Census*		✓	✓
Centers for Medicare and Medicaid Services		✓	✓
U.S. Department of Commerce	✓	✓	✓
U.S. Department of Agriculture	✓	✓	✓
Office of Community Planning and Development*	✓		
Corporation for National and Community Service		✓	
Department of Defense			✓
Department of Education		✓	
Department of Energy			✓
Department of Health and Human Services	✓		✓
Department of Housing and Urban Development	✓		
Department of Justice		✓	✓
Department of Labor	✓	✓	✓
Department of State	✓		
Department of Transportation			✓
Department of Veterans Affairs			✓

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Office of Elementary and Secondary Education*		✓	
English Language Acquisition Office*		✓	
Environmental Protection Agency		✓	✓
Fair Housing and Equal Opportunity*	✓		
Farm Credit Administration		✓	✓
Federal Communication Commission		✓	✓
Federal Deposit Insurance Corporation		✓	✓
Federal Energy Regulatory Commission	✓		
Federal Executive Boards*		✓	
Federal Housing Finance Agency			✓
Federal Labor Relations Authority	✓	✓	✓
Federal Maritime Commission	✓	✓	✓
Food and Drug Administration			✓
General Services Administration		✓	✓
Institute of Museum and Library Services		✓	
Internal Revenue Service			✓
International Trade Commission		✓	
National Archives and Records Administration		✓	✓
National Aeronautics and Space Administration**		✓	
National Capitol Planning Commission	✓		
National Credit Union Administration		✓	✓
National Endowment for the Arts		✓	
National Endowment for the Humanities		✓	✓
Nuclear Regulatory Commission		✓	✓
Occupational Safety and Health Review Commission	✓	✓	✓
Office of Personnel Management		✓	
Railroad Retirement Board		✓	✓
Securities and Exchange Commission*			✓
Small Business Administration		✓	
Social Security Administration*	✓	✓	
* Report specific to listed agency; parent agency may have separate report. ** Agency submitted report in late 2012.			

Although plain language policy was formalized through law almost four years ago, relatively few of the organizations surveyed for this study have a plain language section that is easy to navigate to from the main website's homepage. This means the majority of organizations in the dataset do not have a publicized plain writing program, a designated plain language contact or page that citizens can easily find, or publicly accessible plain language compliance reports. Such a low level of response to USG plain language priorities—regardless of whether an organization falls under the Act's mandates—suggests that plain language does not have the same value at the institutional level it appears to have for writer participants. An analysis of the 2013 reports,

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however, shows that there is far more to institutional-level attitudes about plain writing and plain language policy than simply compliance with the Plain Writing Act's requirements.

Chart 4.1. Agency Compliance Reports by Code

The 29 compliance reports in this dataset range from one page (Securities and Exchange Commission) to 80 pages (Department of Agriculture), with an average length of five pages, excluding attachments, cover pages, and lists of contacts. I segmented the data into 539 excerpts and then followed the coding approach detailed in Chapter 2. Chart 4-1 summarizes the data for the initial round of coding. As is the case with the survey responses and interviews in the first part of the study, references to language features dominate the reports—with more than three times the number of power-related comments, the next most frequent coding category. There are almost equal numbers of power- and process-related comments (97 occurrences for the former; 83 for the latter), followed by readability (50 occurrences) and understandability (49 occurrences). I also coded 37 comments to usability and 25 to accessibility. While writer comments are generally positive, there are also many occurrences of negative affect. Compliance reports, on the other hand, have just *two occurrences of negative affect*. The segmented report data reflect predominantly neutral (284 occurrences) or positive affect (232 occurrences), representations that are driven, in part, by federal plain language policy reporting constructs.
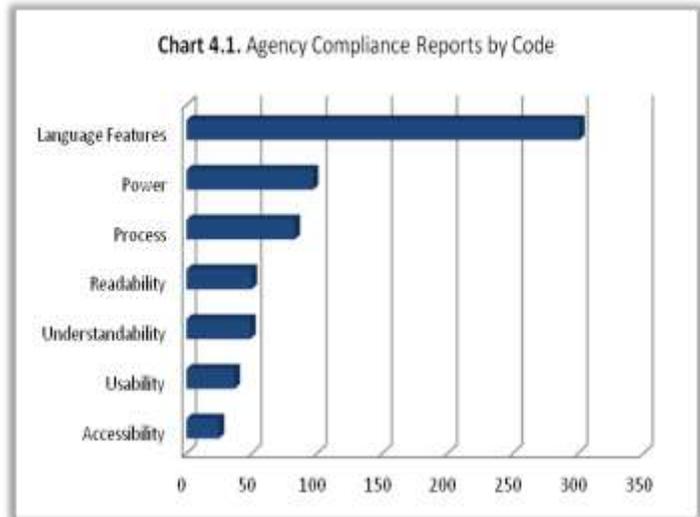
4.3.   Plain Writing Act Compliance Reporting: The Framework

The April 2011 guidance the Office of Management and Budget issued for agencies' implementation of the Plain Writing Act's requirements states the benefits of clear and simple

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communication. The memorandum notes that plain writing is "more than just a formal requirement; it can be essential to the successful achievement of legislative and administrative goals, and it also promotes the rule of law" (1). In other words, plain language is a way to increase citizen compliance with laws, regulations, procedures, and government priorities. At the same time, the Act itself requires a number of things from USG agencies:

1) Meet the Act's six key requirements (as summarized above) by July 13, 2011;

2) Use plain writing in all new or substantially revised documents by October 13, 2011;

3) Publish the initial plain language compliance report by April 13, 2011; and, thereafter,

4) Report on continuing plain language compliance annually.

The Act's language encourages a specific type of reporting from agencies: yes or no answers as to whether they have met certain requirements, numbers of employees trained, types and frequency of training, etc. Similarly, the Office of Management and Budget's implementing guidance reinforces a quantitative approach to compliance reporting, repeating the language contained in the Act. PLAIN's suggested compliance report template (Figure 2) also lends itself to the type of reporting that includes lists of accomplishments over qualitative assessments of how plain writing has affected agency communication with the public. Of the 29 reports I analyzed in this part of the study, 15 use PLAIN's template, although some with modifications. But there are also other factors that influence agency reporting on compliance with the Plain Writing Act. Specifically, the federal report genre plays an important role in what is included and excluded in plain writing compliance reporting as well as how agencies publicly represent the Act, its implementation, and plain language generally.

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Figure 2. PLAIN Compliance Report Template

[Agency Name]

Plain Writing Act Compliance Report

[Date]

I. Senior Agency Official for Plain Writing:

[provide names and contact information for your Senior Agency Official and agency coordinators]

    a. Name of Senior Agency Official responsible for Plain Writing

    b. Names of Plain Language coordinators within the agency.

II. Explain what specific types of agency communications have you released by making them available in a format that is consistent with the Plain Writing guidelines.

Type of communication: of document or posting. List how this is made available to the public	Who is the intended user and approximate number of potential users	What has changed by using Plain Writing

III. Inform agency staff of Plain Writing Act's requirements:

[list the ways you've provided information on the Act to your staff]

    a. Information on the Act is posted on the agency intranet.

    b. Published an article on the Act and its requirements in the internal agency news bulletin.

    c. Posters, signs, etc

IV. Training

[describe training efforts]

    a. Agency provided the following trainings:

Type of Training	Number of employees trained	Date
In house (agency Staff or contractor) – live t		
PLAIN provided training – live		
Webinars		
Online training		

V. Ongoing compliance/ sustaining change

[list the ways you intend to stay in compliance with the Act]

    a. Name of agency contact for compliance issues

    b. Documenting and reporting use of plain writing in agency communications

    c. Clearance process

VI. Agency's plain writing website

[provide information on your website and include links to it]

    a. Website address

    b. Contact us page [www....]

    c. Implementation of the Act

        i. Documents covered by the Act

        ii. Timeline

    d. Links to Compliance reports

    e. Links to OMB and PLAIN

VII. Customer Satisfaction Evaluation after Experiencing Plain Writing

[provide documentation on how you have measured the effectiveness of your use of Plain Writing in your communication with the public both by hard copy and through posting information on your Agency's website. Provide feedback as to user experience in identifying any noticeable change in comprehension and improved level of service]

4.3.1. 2013 Plain Writing Compliance Reports and the Federal Report Genre

The 2013 compliance reports perform a specific function for the USG bureaucracy generally and the Obama administration in particular, namely, to publicly support USG plain language policy priorities while serving agency interests, material and otherwise. But while the federal report genre highlights agency efforts with respect to a particular issue, it also constrains what an agency will include in its reporting. Thus, the report genre lends itself to precisely the type of reporting the compliance reports contain: neutral or positive with lists of accomplishments and ongoing efforts. Furthermore, the compliance reports are not actionable in the sense that a USG entity—presumably, the Office of Management and Budget—can or will take steps based on what they contain. Rather, the reports are, first, informational and, second, visible evidence that agencies are responding, timely, to USG plain language policy priorities. At best, the reports will reflect progress, hence, positive affect. It is unlikely that any report would negatively represent the Act or the plain language priorities of the Obama administration. At worst, an agency might ignore the Act's requirements altogether, respond minimally, or even downplay any lack of progress (neutral affect). Thus, while it *seems* that the 2013 compliance reports represent the Plain Writing Act positively or in a neutral fashion (See "The Data" above), they may not, in fact, reflect either the agency's priorities with respect to the Act or how agency leadership values (or not) plain language.

The Securities and Exchange Commission and Department of Agriculture reports illustrate these points well. In the case of the former, the report consists of a single page that simply lists its compliance-related efforts. It does not contain statements regarding the impact of the Act, nor does it suggest whether the organization's communication with the public has been affected by plain language in any way. Even though the Commission was an early adopter of plain language

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and published a plain language handbook in 1998, the report provides very little substantive information about the organization's commitment to plain language, which, based on its actions, appears to be quite strong. The report gives no indication of whether the Commission's leadership supports the Act, despite the fact that it long ago took up plain language in its communications (*SEC.gov/plainwriting.shtml*). The report also fails to articulate to what extent it has met the requirements outlined in the Office of Management and Budget guidance, only that it has done so. Nonetheless, there is nothing negative in this document.

On the other hand, Agriculture, to which the Center for Plain Language gave "A/B" grades on both the 2012 and 2013 report cards, compiled an 80-page submission. The segments this report generated[15] all have positive affect (29 occurrences out of 29 segments), and the report itself details the accomplishments of its component organizations at length—including its plain language documents and trainings. The report also indicates that the Plain Writing Act has positively impacted the agency's communication with its stakeholders. "This renewed effort [implementing the Act] has resulted in an overall improvement in communication with the public, as well as a greater sense of accomplishment among our employees" (4). If Agriculture had problems implementing the Act or experienced resistance to its requirements, the report does not reflect these challenges.

4.3.2. Compliance Reporting Versus Practice: Writer Insights

Writer participant comments, however, reveal what the compliance reports do not, indeed, will not—that agencies and their personnel do not always support the USG plain language policy agenda in practice. WI-1, for example, is very positive about and committed to plain language: "If we could somehow get across the message that you have the right to be able to understand communications from your government, that would be fabulous." However, he also indicates

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WI=Writer Interviewee   UI=User Interviewee

that his agency has not been very effective in implementing the Act. The agency set up a plain language website after the Act passed, but he says nothing has been done with it since. And although there is an implementation plan on the website, I was unable to find any compliance reports. WI-1 indicates that he is very committed to plain language. He has long been involved in the USG's plain language efforts and even conducts plain writing training in other agencies. Nonetheless, his comments convey ambivalence on the part of his agency with respect to the Act, an ambivalence that is not evident in the Act-related materials it has published. WI-4 also expresses reservations about her organization's commitment to plain writing: "Many managers give it lip service, but a lot of the older managers don't believe in it." Yet the report her agency submitted does not at all reflect the tensions she references.[16] WI-2, on the other hand, is extremely positive about the steps his organization has taken to implement the requirements of the Plain Writing Act, noting that leadership is very supportive of efforts to shift toward a plain writing culture. However, the parent agency's report neither reflects this enthusiasm nor the progress WI-2 describes.

4.4.   Institutional-Level Language Beliefs: What is Plain Writing?

In Chapter 3, I show that writer participants often view plain writing as good writing and most link it to clear and concise writing. Most of these writers also forward plain writing as a function of the characteristics typically associated with the plain style (e.g., minimal legalese, useful headings, bullet points, etc.). At the institutional level, there are also three basic articulations of plain writing: plain writing as specific language characteristics, plain writing as good or correct writing, and plain writing as clear and concise writing. It is often represented in report narratives as clear or concise writing. For example, the Department of Defense compliance report indicates that the Missile Defense Agency offers a plain writing course to

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WI=Writer Interviewee   UI=User Interviewee

teach students about the principles of plain language and "other clear-writing techniques" (2).

The Department of Energy notes in its commpliance report that Energy Information

Administration personnel "know where to go for help and advice on writing clearly" because the

organization has a writing style guide and point of contact for plain language (6). The Nuclear

Regulatory Commission offers trainig to teach "elements of plain writing and clear

communication" (1), and the Department of Justice's Office on Violence Against Women

indicates under its plain language-related efforts its goal to make information "accurate, clear

and concise" (6). In fact, many reports use the Act's definition of plain writing: "clear, concise,

and well-organized" (Sec. 3 (3)).

While most of the reports talk about plain writing in terms of clarity and conciseness, a small

handful of the narratives explicitly link plain writing to good writing. The Department of

Transportation report makes the case for training to help employees improve their writing

because "[g]ood writing does not develop spontaneously" (2). Similarly, the Federal Housing

Finance Agency notes that although most of its documents are not covered under the Plain

Writing Act, it is committed to producing documents that are "clear concise and well organized"

through training and coaching aimed at helping employees to improve their writing (1). Several

other reports contain instances of such language valuation (Department of Defense, Commerce,

Federal Labor Relations Authority). However, overall, the reports do not explicitly reference

good versus bad writing in the context of plain language. Rather, this connection can be inferred

from the mechanisms agencies use to forward plain writing, specifically, plain writing training.

Agency approaches to plain writing training link EAE to plain bureaucratic writing and

imply plain language as the fix for bad, grammatically incorrect, etc., writing. Commerce's plain

writing training, for example, includes Business Grammar: Common Usage Errors and Business

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Grammar: Punctuation, among others. The Department of Justice and the Nuclear Regulatory Commission offered similar training courses. The Missile Defense Agency's "Writing the MDA Way" training teaches plain writing techniques, grammar, and punctuation, while the National Security Agency offers a workshop in which "[s]tudents learn how to write sentences that are structurally sound and free of jargon" (*Department of Defense 2013 Compliance Report* 2-3). These trainings presume the principles of standard written English as the underpinning for the plain writing that aims to correct the problems associated with traditional bureaucratic writing. Yet while reports frequently articulate plain bureaucratic writing as clear, concise, and good writing, it is most commonly formulated at this level of policy as a function of its features.

The coded data highlight the extent to which language features predominate representations of plain bureaucratic writing in compliance reporting. Fully 56% of report excerpts reference the characteristics and qualities of plain writing. Figure 3 below is an excerpt from the National Archives and Records Administration compliance report and a good example of the manner in which many agencies forward plain writing. It indicates language features as the way plain writing has been used in its communications. This approach to compliance reporting presents language features—e.g., fewer words and more personal pronouns—as the organization's plain language accomplishments. The agency does include several examples related to organization ("Organized text so that the main point is highlighted at the top") and document design ("Articles . . . have short paragraphs, headings now break up text and guide reader"), which the literature also usually identifies as plain language techniques. The report's emphasis, however, is primarily on language characteristics. There are 19 references to language features in the National Archives and Records Administration compliance report alone, but only two statements about accessibility, while there are four comments each that relate to understandability and

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WI=Writer Interviewee   UI=User Interviewee

usability. In this report, accessibility, understandability, and usability simply are not as important as language features for showing plain language progress.

The National Archives and Records Administration compliance report is by no means an anomaly. The Department of Energy report also has 19 references to language features, but there are no comments about accessibility, five mentions of understandability, and just one statement about usability. Likewise, there are 16 statements in the Department of Justice report about language features, two related to accessibility, three about understandability, and two comments on usability. The predominance of excerpts that reference language features is not based on the size of the agency; the Department of Defense has more than two million active duty and civilian personnel (*Defense.gov*), and its 2013 report contains 16 references to language features. The Department of Commerce has almost 47,000 employees (*Commerce.gov*), and its report references language features 26 times. There is, of course, some correlation between length of report and occurrences of comments related to language features; however, many of the shorter reports reference language features more frequently than do longer reports. At the same time, some reports have just a few comments about language features—but still more than accessibility, understandability, or usability. The Food and Drug Administration report comments

Figure 3. National Archives and Records Administration 2013 Compliance Report Excerpt

on language features just once and the Veterans Administration report four times. Each report, however, has fewer references to accessibility (0 and 1, respectively), understandability (0 and 1, respectively), or usability (0 and 3, respectively) than to language features.

These findings are important for several reasons. First, they highlight the fact that, like federal writers in the study, compliance reports privilege language features over other factors, including those related to the Act's goals, and they do so regardless of the size of the agency, its mission, or the length of the report. Second, the prevalence of language features in the compliance report dataset suggests a government-wide orientation to plain language rather than just an agency-level orientation. It is not just one or several agencies that point to language features *as* plain language implementation; all the reports take this approach. That is to say, the USG consistently forwards plain writing progress as a function of the prevalence of plain language characteristics and qualities in official texts, not as plain language's substantive impact on USG documents or the citizens who use them. Put another way, compliance reports do not generally report on how organizations are meeting the *goals* of the Act; rather, the reports describe agencies' implementation of the Act's *requirements*—and particularly insofar as they relate to specific, measurable plain language practices. Of course, as I note above, the federal report genre, the Office of Management and Budget's implementing guidance, and the PLAIN template all encourage the type of reporting that emphasizes requirements over goals. Additionally, it is simply easier to ascertain how many instances of a particular plain language characteristic are in a text than how that text is more accessible, understandable, or usable.

SR=Survey Respondent   FG=Focus Group Participant
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Chart 4.2. Select Language Features in Plain Writing Compliance Reports
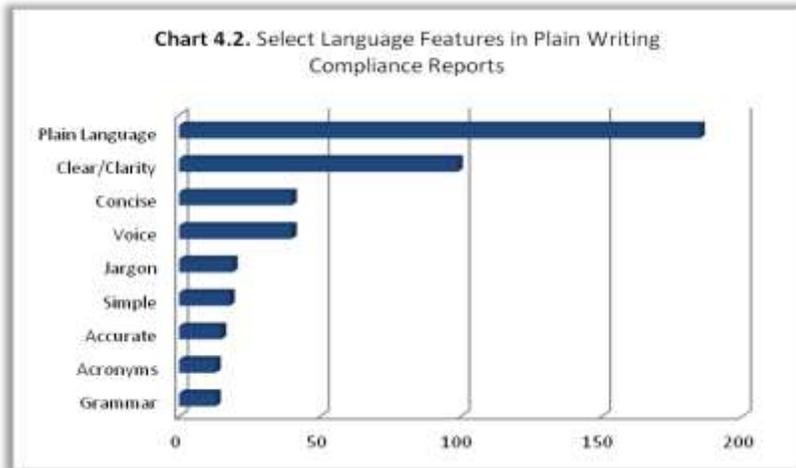
Most of the reports treat the use of plain language techniques in their documents as a measure for how well they have complied with the Act's requirements. Agencies that used the PLAIN template, in particular, tended to interpret the "How plain writing has been used in these communications" as "Plain language principles you have applied to these communications." As Chart 4-2 illustrates, in addition to plain language, the compliance reports primarily emphasize clarity, voice, and conciseness. Secondarily, they reference simplicity, grammar, and jargon. Commerce, for example, highlights writing that "focuses on clarity with minimized jargon," and notes that some writers are using plain writing techniques such as "active voice, fewer words, getting to the point, less bureaucratic" (3). Similarly, the General Services Administration reports that its documents have changed with the use of plain writing by containing shorter paragraphs, more personal pronouns, clearer instructions, and fewer acronyms (1).

The understanding of plain writing in these reports as primarily a function of specific language characteristics and qualities now emplaces the agency as the arbiter of plain writing, not the reader. Official documents are included in the reports because agency leadership deems (or agrees) that they have the features typically associated with the plain style. Such documents meet the Plain Writing Act of 2010's mandate of clear, concise, and well-organized bureaucratic writing since they have certain characteristics; thus, the agency can claim compliance. Additionally, for those agencies that link plain writing to clear writing and vice versa, a

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

document can be considered clear and concise writing by virtue of its plain language

characteristics and qualities. Similarly, to the extent that plain writing is good writing, the use of

plain language techniques in a government text means that the document represents good

writing. However, whether or not these texts are actually [more] accessible, understandable, or

usable as a result of plain language features is certainly arguable. As the epigraph to this

chapter—an excerpt from the Food and Drug Administration's 2013 compliance report—

illustrates, even plain writing can fail to make sense.

4.5.   What Plain Writing Does

The final element in the PLAIN compliance report template instructs agencies to indicate

how they evaluate the effectiveness of their use of plain writing in communications with the

public, including any measures related to better comprehension and improved service levels.

Agency responses to this element vary widely: the Department of Justice indicates that it is in the

process of developing measures and is considering the measures of other agencies; tracking

employees trained in plain writing and the number of complaints related to confusing writing;

and adding a plain language requirement to employee performance evaluations, including a

measurement to assess whether employees write clearly and concisely. The Railroad Retirement

Board uses the Flesch Reading Ease Test and the Flesch-Kincaid Grade Level calculation to

measure its application of plain writing principles. Several agencies indicate that they use other

automated tools—either commercial-off-the-shelf products or customized applications—to

measure their plain writing performance (Centers for Disease Control). Additionally, a number

of agencies test their documents to assess readability (Department of Energy, Federal Housing

Finance Agency), understandability (Census Bureau, Centers for Medicare & Medicaid

Services), and usability (Census Bureau, Department of Transportation). Some use surveys to

SR=Survey Respondent   FG=Focus Group Participant
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gauge customer satisfaction (Veterans Administration). Other organizations measure the

effectiveness of their plan language efforts based on user requests for assistance (Health and

Human Services, National Archives and Records Administration, Veterans Administration).

Finally, as instructed in the Office of Management and Budget implementing guidance for the

Act, reporting agencies have mechanisms for the public to comment on how well they apply the

principles of plain writing.

There are various approaches for measuring the results of agencies' plain writing efforts—

when, in fact, agencies measure their plain language-related process beyond the instances of

specific language characteristics. However, there is a lack of well-defined, consistently applied

metrics for evaluating what the Act's implementation is yielding in terms of its stated

objectives—both for the USG and the citizens it serves. The measures listed in the compliance

reports do not include such information as increased or decreased compliance, indicators of

users' ability to better (or not) navigate a particular agency process, or changes in customer

behavior. Such data may exist, but they are not indicated in the compliance reports. Additionally,

several reports suggest that plain writing can make or has made communication more effective

(Federal Labor Relations Authority, Transportation), but they do not define *effective* in the

particular agency's context. Similarly, some (Internal Revenue Service, Health and Human

Services) state that plain writing facilitates their ability to provide "meaningful" information, but

they do not explain what *meaningful* is or how it is measured.

Overall, the reports contain far fewer comments about accessibility, understandability, and

usability than statements related to language features. Therefore, they offer little information

about how plain bureaucratic writing substantively affects government-citizen interaction by way

of official texts. Moreover, the reports generally fail to explain what would constitute substantive

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WI=Writer Interviewee   UI=User Interviewee

impact, how it is or would be measured, and what such measures suggest for users, writers,

agencies, and USG plain language policy. We are left wondering, then, what this plain

bureaucratic writing *does* for federal agencies in terms of their ability to tell citizens what to do,

especially since there are more "what it is" references in the reports than "what it does"

references. How do agencies comply with the "spirit of the Act," as the Center for Plain

Language puts it (*Centerforplainlanguage.org*)?

4.5.1. Accessibility

Largely missing from the 2013 plain writing compliance reports are discussions about how

plain language has affected the accessibility of government documents. Those reports that are

formatted according to PLAIN's template often—but not always—list the media through which

documents are made available to the public: press releases, paper forms, and online, etc. But

beyond this information, fewer than half the reports comment on access-related issues, and the

reports that do include such information (13 of 29) generally have only one to three references.

Commerce, with seven comments about accessibility, is the exception. Its report describes how,

for example, the Office of Inspector General tries to make findings available to stakeholders

through "succinct and jargon-free" language (11). It also indicates in its "What has changed by

using Plain Writing" section that the public now has access to Freedom of Information Act

responses. As a rule, however, agency reports do not directly address whether their plain writing

efforts make documents more accessible to the public, let alone *how* they use plain writing to

enhance the accessibility of their documents and to what degree of success.

4.5.2. Understandability

While the reports clearly prioritize language features over the other coding categories, they

also frequently correlate language practices (e.g., use of personal pronouns, active voice, and

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

everyday words) directly to comprehensibility. Throughout the "What's Changed" section of its compliance report (See Figure 3), the National Archives and Records Administration implies this connection by primarily listing language features after explaining, "Our goal is to always write plainly so that the public can find what they need, understand what they find, and use what they find to meet their needs" (3). Similarly, the Consumer Financial Protection Board mentions understanding just twice—both times in the same sentence, which is about how comprehension impacts consumer behavior. However, it has "adopted plain language as the core principle for all consumer-facing content . . . . [applying] plain language principles in all of our consumer print and online media" (5). The implication is that the more prevalent such features as personal pronouns, active voice, and correct grammar, among others, the more understandable the document. In terms of frequency, however, references to understandability fall well behind comments related to language features.

All this is not to say that the 2013 compliance reports more or less fail to address how plain language affects the understandability of the documents USG agencies generate. On the contrary, several reports describe efforts to gauge user comprehension in the plain bureaucratic language context. The Internal Revenue Service hired a plain language contractor to help it measure user comprehension of and perceptions about its communications. Likewise, the Centers for Medicare & Medicaid Services engages with users to test out its products in order to ensure their understandability. But despite this attention to the understandability of their texts, both organizations pay more attention to language features than to comprehension. Overall, even when agencies reference understandability in the reports, they do not outline *how* or to what extent plain language facilitates users' understanding of their documents, although they do explain how and to what extent they are applying plain language principles to their texts. This

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

pattern suggests that like accessibility and usability, understandability is less important at the institutional level than the fact that plain language techniques are applied to official texts—to whatever end.

4.5.3. Usability

There are some reports that describe how agencies are meeting the stated goals of the Plain Writing Act as opposed to simply relying on enumerations of plain language characteristics as proof of compliance with its mandates. In particular, when reports reference usability, they often do so in terms of plain language's substantive impact on the public's ability to use the information in an official text to accomplish a desired end, whether the agency's or the citizen's. The Census Bureau, for example, notes that its forms go through "rigorous testing" to ensure their understandability and usability and says the beta version of its plain language glossary has undergone three rounds of usability testing, with more to follow (1). Additionally, despite its emphasis on language features insofar as they relate to the Act's requirements, the National Archives and Records Administration says it uses a survey tool to gauge the clarity of its instructions and the usability of online request forms. The Department of Transportation's Office of the Chief Information Officer developed a style guide that "emphasizes Plain Language principles in both design and content . . . . On the design side, it explains how to use headers, keywords, and other tools to make pages easy to use" (1). Additionally, the Centers for Disease Control uses its Clear Communication Index to facilitate understandability and "measures the effectiveness of its documents through audience testing, such as focus groups, interviews, and usability testing" (5). Despite these efforts, however, the majority of reports say relatively little about usability.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

A comparison of the coded excerpts highlights the compliance reports' focus on what plain writing is versus what plain writing does. Of the reports' 539 excerpts, 301 reference language features, that is, the language practices and qualities agencies recognize as plain writing. On the other hand, the 29 reports reference accessibility just 25 times—less than one time for each report. Further, there are only 37 comments about usability and 49 related to understandability. Even though the purpose of the Plain Writing Act is to "promot[e] clear Government communication that the public can understand and use" (Sec. 2), compliance reports are six to ten times more likely to reference agency or writer language practices than how these practices affect the audience for which plain writing is supposed to make government information clear, accessible, and easy to use.

4.5.4. Plain Writing: Adding Value to Audience or to Agencies and Writers?

As I note in Chapter 1, plain language literature, almost universally, emphasizes the importance of audience. Similarly, the Plain Writing Act states that its focus is the public for which USG documents are produced: "[It is an Act t]o enhance citizen access to Government information and services" (Introduction). Likewise, the Office of Management and Budget's implementing guidance highlights the central role of the citizen in USG plain language policy priorities, noting,

Chart 4-3. Agency/Writer versus Audience Emphasis

"Avoiding vagueness and unnecessary complexity makes it easier for members of the public to understand and to apply for important benefits and services" (1). However, this concern for
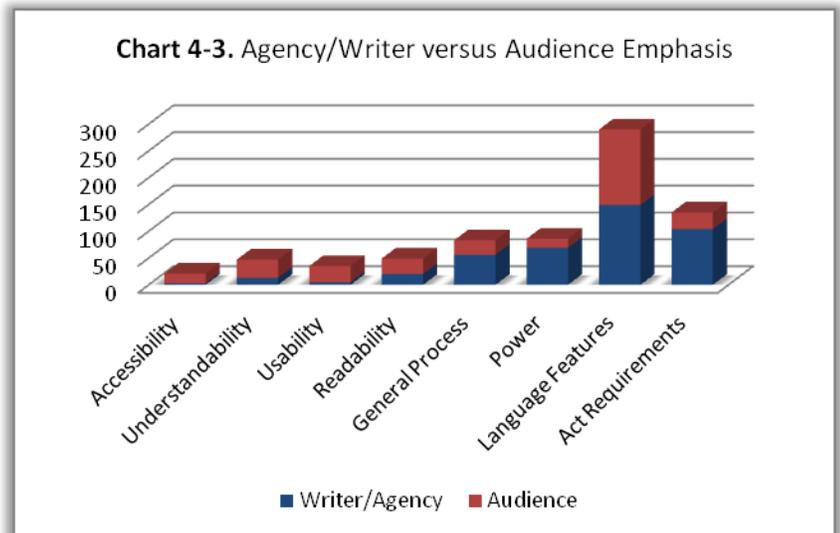
audience is not always manifested in Plain Writing Act compliance reporting and certainly not to the degree the literature privileges it or the Act and its implementing guidance represent it. Of the 539 segments generated by the reports, just 37% focus on the needs of the public that the Act is designed to support.

Agencies that have more direct interaction with the public (Health and Human Services, Internal Revenue Service, Agriculture, Commerce) generally tend to focus on audience more than those agencies with less public interaction (Department of Justice, Department of Defense). Additionally, when reports reference the Act's requirements, authoritative relationships, and process, they often focus more on the agency or writer than on the audience (See Chart 4-3). Comments related to language features are almost evenly split between agency/writer (149 occurrences) and audience (141 occurrences), but references to accessibility, readability, understandability, and usability largely highlight the needs of readers. Every compliance report addresses audience in some form except the Department of Labor, with Commerce, National Archives and Records Administration, the Internal Revenue Service, and Health and Human Services most frequently commenting on audience-related issues. Nonetheless, the reports simply do not attend to audience-related concerns to the same degree they consider issues of importance to USG agencies, nor do they reflect the importance plain language literature and USG plain language policy attach to audience.

The reports also do little to complicate conceptions of audience, with few reports acknowledging reader diversity beyond functional categories (teachers, veterans, investors, etc.). Some reports address difference by pointing out that what is plain for one audience is not necessarily plain for another or referencing the "target" or "intended" audience (Department of Defense, Agriculture, Commerce). Many mention an agency's "general audience" or "the

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public" (Occupational Safety and Health Review Commission, Census Bureau, Nuclear

Regulatory Commission, Veterans Administration). Other compliance reports indicate broad

categories of audience, for example, the Department of Energy's "broad consumer and business

audiences" (1) or the Internal Revenue Service's general public versus its tax and legal specialist

audience. The Centers for Medicare & Medicaid Services is one of the few organizations that

acknowledges a diverse and layered public, noting, "By understanding our target audiences'

health literacy, culture, language, attitudes, perceptions and identifying barriers we have

improved our products and therefore our audiences' ability to understand our programs" (1).

Additionally, Commerce writes, "Because our stakeholders include Congress, Departmental

leadership, and members of the public, it is critical that reports be written in a manner that can be

quickly understood by this diverse group" (11). With such statements, Commerce and the

Centers for Medicare & Medicaid Services acknowledge the particularities of a given audience

as well as diversity across audiences. Generally speaking, however, when the 2013 compliance

reports reference audience concerns, they assume "an" or "the" audience.

4.6.   Concluding Remarks and Looking Ahead

Federal agencies, like the writers in this study, generally articulate plain bureaucratic writing

as a function of language features, not in terms of how it affects government-citizen interaction

through official texts. They also link it to clear, grammatically correct, good writing as it is

grounded in the EAE tradition, doing so both explicitly in the reports and implicitly through

mechanisms such as plain writing training. Despite the fact that the reports attend to audience-

related issues, understandability and usability play relatively minor roles in institutional-level

plain language representations. Furthermore, accessibility of government documents in the

context of plain language appears to be of little concern to USG agencies. The compliance

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

reports provide few indicators of the Plain Writing Act's efficacy, whether in terms of the USG's ability to influence citizen behavior or with respect to clearer communications that the public can access, understand, and use. Instead they focus primarily on the Act's requirements, an emphasis that the Act's provisions, its implementing guidance, and PLAIN's template encourage. Nonetheless, these reports are generally neutral or positive, in part because of the limitations the federal report genre places on what can and should be included in them.

Taken together with the comments of writer participants, this analysis of agencies' 2013 compliance reports reinforces van Dijk's point about the controlled nature of agency representations. None of the reports suggest that the Act is not viable, but at the same time, most offer little substantive information about agencies' plain language-related efforts beyond the use of plain language techniques or how those efforts further the Act's goal of clear government communication. Furthermore, from the comments of the federal writers who participated in the study, we know there are problems with the Act's implementation, differences of opinion across and within agencies about plain language as a priority, and mixed reviews about plain language legislation's capabilities. However, none of these conflicts are visible in plain writing compliance reporting. Rather, the reports provide a one-sided, highly moderated account of agency compliance with the provisions of the Plain Writing Act of 2010; the representations of plain bureaucratic writing they forward are the "public face" of USG plain language policy.

This analysis also highlights the differences and similarities between writer participant and institutional understandings of plain writing, what it does, and whom it affects. Not only are there various and overlapping conceptions of plain bureaucratic writing across policy levels, but there are also divergent understandings of what plain language does as well as how to measure it. Additionally, there are tensions resulting from differences in agency priorities and writer

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

participant objectives. What, then, do these tensions and convergences mean for users of USG

plain language documents? The analysis that follows will help to show how language beliefs,

practices, and management interact across and within the institutional, writer, and user levels of

language policy to impact government-citizen interaction through official texts.

Chapter 5. Users Speak: Put It "IN PLAIN ENGLISH!"

"Secret codes and vague messages? Not on *CIA.gov*. The Central Intelligence Agency is committed to conveying its mission to the public in clear, concise language in compliance with recent legislation" (*CIA.gov*).

5.1.   Introduction

Schiffman posits language policy as a distinctly social construct that is grounded in linguistic culture as it is engendered by tradition, behavior, and belief, among other factors, including attitudes toward language and literacy (212). For Shohamy, understanding this policy means examining how language affects and is affected by the mechanisms that operate as language policy tools, e.g., USG documents (Loc. 214-218). Cassels Johnson emphasizes the "dynamic social and historical contexts in which [a] policy exists" (Loc. 4765), pointing out that even individuals who are not in positions of power, e.g., users of USG documents, are language policy agents (Loc. 4774). In this chapter, I analyze plain language policy at the user level to better understand how focus group and interview participants operate as agents of U.S. plain language policy. I examine their views on plain bureaucratic writing, grounding my analysis in their experiences with and observations of plain and non-plain language documents produced by the USG. I consider the relationship between users' language practices and policy mechanisms in order to identify how they appropriate plain language policy and to what ends.

As expected, the data reinforce that official documents written in the plain style facilitate user comprehension; however, users forward plain language as but one means toward understandability, not as an end in and of itself.

Chart 5-1 Users by Age

21-34 — 17%
35-50 — 39%
51-65 — 33%
66-75 — 5%
Over 75 — 6%

Language beliefs and practices, in addition to context, are as important as plain language to

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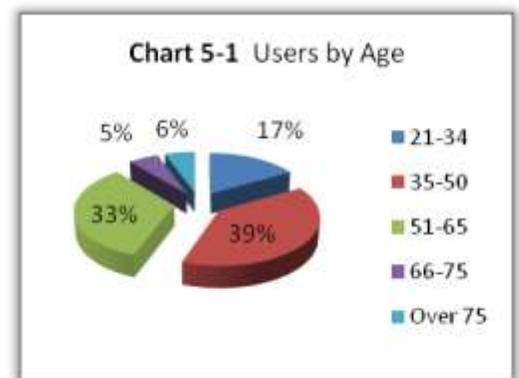
users' ability to access, understand and use government documents, if not more so. Finally, the users in this study show how language policy mechanisms—in this case, official texts and the processes in which they are situated—reflect perceived power relationships and inequities to which users respond in various, sometimes unhelpful, ways that are not always consistent with articulated language policy goals. Put another way, user participants appropriate USG plain language policy to their own diverse ends, which do not always correlate to the Plain Writing Act's stated goals, institutional-level representations of plain bureaucratic language, or writer participant formulations of what plain language is and does in the USG language policy context.

5.2.   User Demographics and Language Practices

A total of 18 users participated in the focus groups (14) and interviews (4). Study participants represent diversity of age, level of education, and income, as Charts 5-1, 5-2, and 5-3 illustrate. Some are unemployed; others are retired or disabled and unable to work. The participants who are employed work in various professions and positions: executive assistant (UI-4), self-employed (FG1-4, FG1-7, UI-2, UI-3), EAL instructor (UI-1), teacher's assistant (FG1-5), certified nursing assistant (FG1-6), discount store department manager (FG1-3), and student assistance provider (FG2-4).

Chart 5-2. Users by Level of Education
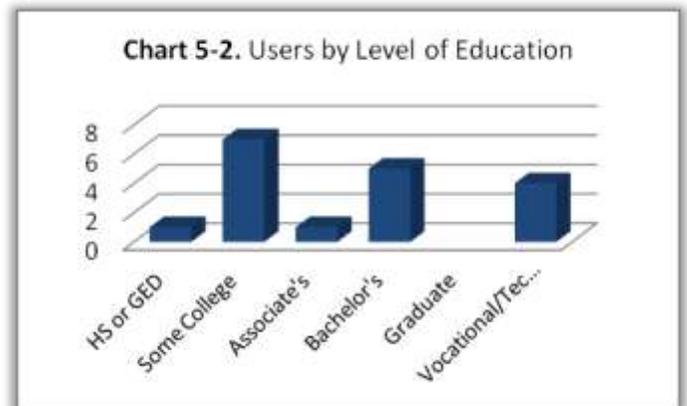
Participants are almost equally divided between female (56%) and male (44%) female, and all but one, UI-3, identify as not Hispanic or Latino.[17] Users who participated in the study are almost evenly split between Black or African American (44%) and White (50%), with one participant, FG2-5, who identifies as American Indian or Alaska Native.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

Chart 5-3. Users by Income Level
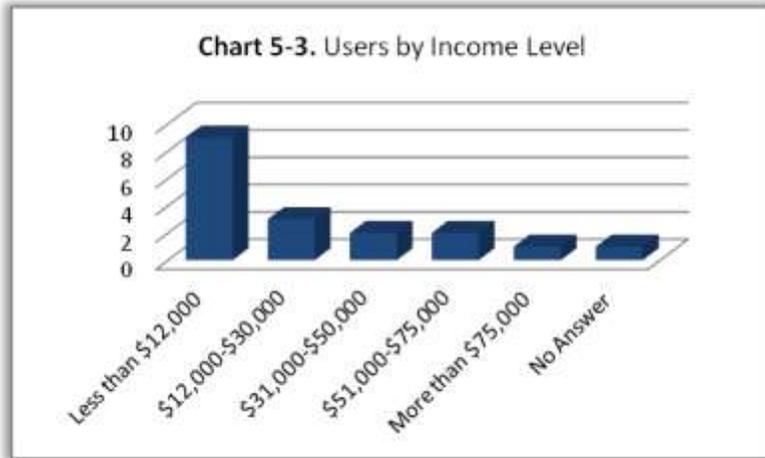
Users also represent a range of language practices. Eight user participants know languages other than English (Russian, Spanish, German, French, Italian, Estonian, Persian, and Arabic), and one knows four languages—three with more than limited proficiency (UI-1). Three participants speak English as a second language, with Russian, Persian, and Spanish as their first languages. Additionally, a number of participants speak Black Vernacular English (FG1-2, FG1-5, FG1-6, FG1-7, FG2-4, FG2-6, FG2-8), and one (UI-4) speaks in Cajun Dialect. The majority of user participants indicate that their knowledge of English is good (56%), and 28% say they have expert knowledge of English. Two user participants (FG1-3 and UI-2) rate their knowledge of English as basic. Both of these individuals are White; FG1-3's only language is English, while UI-2's first language is Persian. Of the individuals who rate their knowledge of English as expert, two are Black or African American (FG1-5 and FG2-4), one is American Indian or Native Alaskan (FG2-5), and two are White (FG2-3, and UI-1). UI-1, who teaches English, is the only EAL speaker who rates her knowledge of English as expert. However, all the EAL user participants rate themselves as expert in their first language.

User participants also rated their English speaking, reading, and writing proficiencies as part of the study. Chart 5-4 summarizes their responses. More users rate their collective proficiencies as average (39%), than above average (28%) or excellent (21%). One user, the native Persian speaker, rates all his proficiencies as below average.[18] Overall, more users describe their

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

speaking proficiency as average, but they rate their writing proficiency equally as average or above average. Within the excellent category, reading proficiency has the most occurrences (5), while speaking and writing each have three

Chart 5-4. User Self-Ratings of English Proficiencies
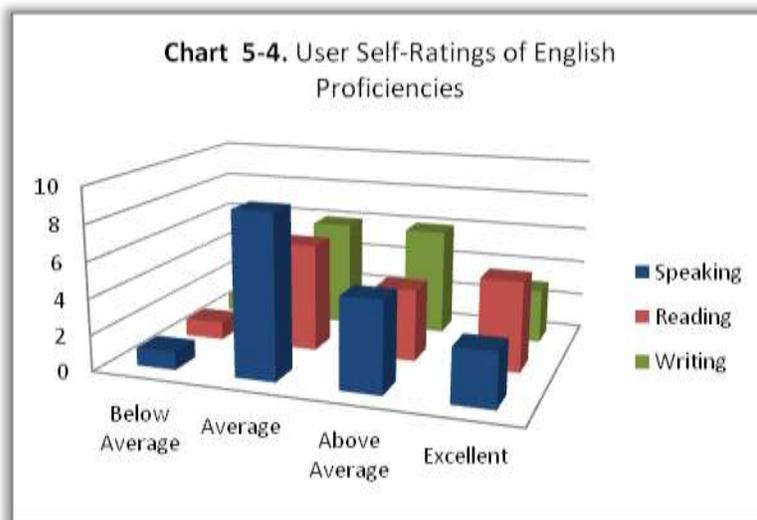
occurrences. Nonetheless, fewer participants rate themselves as excellent speakers and writers than as average or above average speakers and writers.

Some user participants appear to have literacy-related problems. For example, it quickly became apparent during my interview with UI-2 that he has limited English reading ability. In fact, he requested that I read the questionnaire to him and fill in the answers for him. After glancing at the plain and non-plain language examples attached to the questionnaire (See Chapter 2), he requested that I read them to him as well. Despite their self-ratings to the contrary, several other participants either appeared to or obviously struggled with the materials. FG2-2 experienced a traumatic brain injury in an automobile accident and routinely requires assistance with tasks such as filling out forms. She was easily distracted during the focus group discussion, frequently going off topic when responding to questions. She also struggled with the forms and was unable to complete the questionnaire. FG2-8, who is in the over-75 age category, also was unable to complete the questionnaire—particularly the section with comparisons of plain and non-plain language examples. Finally, FG1-6 seemed to struggle with the materials, taking much longer than her colleagues to read the documents. Still, she was able to complete the

questionnaire and contributed many useful insights to the discussion. See "Understandability"

below for a fuller discussion of plain language and literacy.

5.3.   The Data

To better understand user attitudes about plain language and their assessments of its effects

on official texts in the terms outlined by the Plain Writing Act and its implementing guidance, I

asked focus group participants and interviewees to share their impressions of the plain and non-

plain language documents in the study packet. I also asked them to talk about their experiences

with the government documents they typically use or have used in the past. As is the case with

the writer participant survey responses and interviews and the 2013 plain writing compliance

reports, I then coded the user data against the categories outlined in Table 2-2. My goal was to

identify themes and relationships across user comments about the documents in the study packet

as well as with respect to the users' general experiences with official texts.

5.3.1.   Evaluation Results: Participants Usually Prefer Plain Language Documents

Overall, users indicated in their evaluations of the texts in the study packet that they prefer

the plain language documents to the non-plain language documents. Moreover, their comments

about the features of plain writing are usually positive. The documents that generated the most

positive comments (*Application for Advance Permission to Enter as Nonimmigrant* (*Advance

Permission*), *The Appeals Process*, and, "Breast Pumps") have many of the characteristics

typically associated with plain writing: short sentences, common words, and plenty of white

space, among others. Additionally, users generally prefer the plain language examples in the

questionnaire to the non-plain language versions. While some indicate that both examples are

easy to understand, 50% prefer the plain language example in the A/B set to the non-plain

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

language example, 61% prefer the plain language example in the C/D set, 67% in the E/F set, and 53% in the G/H set.

At the same time, user responses suggest great variability in preferences. For example, 28% say they understand the plain language example in the questionnaire's I/J set better than the non-plain language version, but 27% say the reverse. Another 27% of users indicate that both are equally easy to understand. Similarly, comments about many of the documents in the study packet are mixed—in emphasis and, to a lesser degree, with respect to affect. For instance, UI-4 makes very negative comments about the Census Bureau's plain language website, while UI-3's comments are mixed. FG1-5 is strongly positive about the Internal Revenue Service's web publication; however, UI-4 finds it difficult to read because of the "[l]ittle-bitty letters, and a lot of 'em." *The Request for Review of Hearing Decision/Order* (*Request for Review*) form generated many negative comments: ". . . that is confusing" (UI-3); "I don't know. And I cannot figure it out" (UI-1); and "It's not in plain language" (UI-4). Other comments, however, are positive: "This is the best form" (FG2-4); "It's pretty self-explanatory" (FG2-5).

Finally, the comments also highlight the important role of preference to user interaction with official texts. Even when users agree that a document is in plain language and easy to read, they do not always *like* it, sometimes for reasons that have nothing to do with the text, its content, or its design. As a result, they may not be inclined to try to understand or use the text. FG2-2, for example, expressed annoyance with *Certificate*, going on to explain problems she has had related to her former husband that come to mind when she read this document. Her interaction with the text appear to be based as much on her past experiences as on how the materiality of the document—its design features, the words it contains, etc.—facilitates comprehension or usability.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

5.3.2. The Coded Data

The user focus groups and interviews yielded 624 coded excerpts. Chart 5-5 shows that user

participant comments refer to understandability (189 occurrences) more than to any other coding

category. Comments related to language features also figure prominently in the user participant

dataset, as do statements about process, with 172 and 162 occurrences respectively. References

to readability (95 occurrences), usability (86 occurrences), and power (73 occurrences) appear in

the excerpts significantly less often than

comments about understandability,

language features, and process. Finally,

fewer than 7% of user statements

reference accessibility. User comments

reflect negative affect approximately 1.5

times more often than positive affect,

and proportionally, comments linked to

accessibility and readability are more

Chart 5.5. User Comments by Code
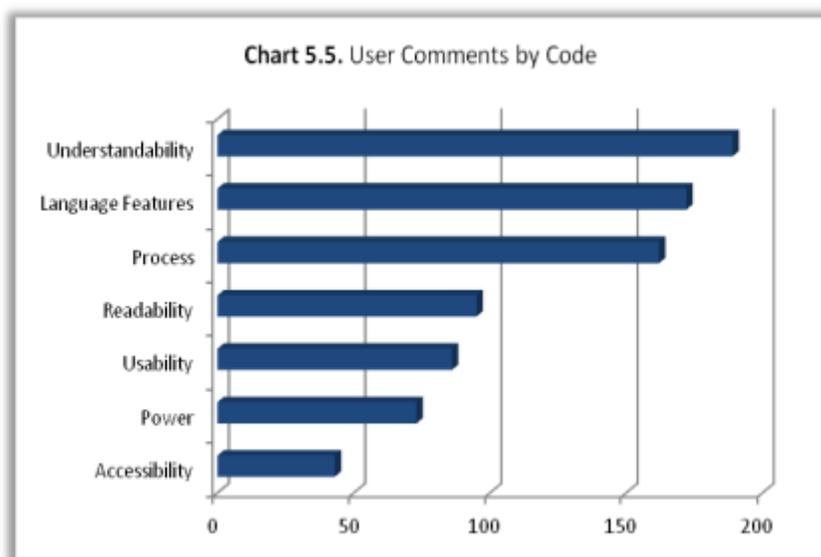
positive than negative, although only slightly more so in the case of accessibility (see Chart 5-6).

Comments related to power, however, are negative approximately 3.7 times more often than they

are positive. Similarly, references to process reflect negative affect just over three times as often

as positive affect.

User participants have a substantially different orientation to plain language and the Plain

Writing Act than either writer participants or agencies, both in terms of what is emphasized and

how it is emphasized. Of the three datasets, only the user excerpts reflect predominantly negative

affect. Additionally, user participants privilege understandability in their comments, whereas

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writers and compliance reports emphasize language features. At the same time, there are

differences in the affective nature of comments about both language features and

understandability across these levels of language policy. User comments referencing

understandability tend to be negative. On the other hand, not a single report reference to

understandability is negative, and writer comments about understandability are more likely to be

positive than negative. Writer and report references to language features are also likely to be

positive, while there is no clear pattern in the tone of user comments related to language features.

A closer look at user conceptions of plain

language and what it does in the

bureaucratic context helps to explain

these differences in orientation and what

they mean for USG plain language

policy.

5.4.   User-Level Language Beliefs: What Is Plain Language?

As I did with the federal writers in the study, I asked users to define and describe plain

language, which they almost always represent as a means toward greater understandability. Some

user participants describe plain language by way of its qualities or language features; however,

they generally frame them as characteristics of texts that are more understandable. "Not a lot of

long words that you have to be a genius to figure out what it means . . . common English both

you and I can understand," says FG1-6. For her, the short words that most people know make a

text more understandable. FG2-5 points out that the web article "Health Care for People with

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee
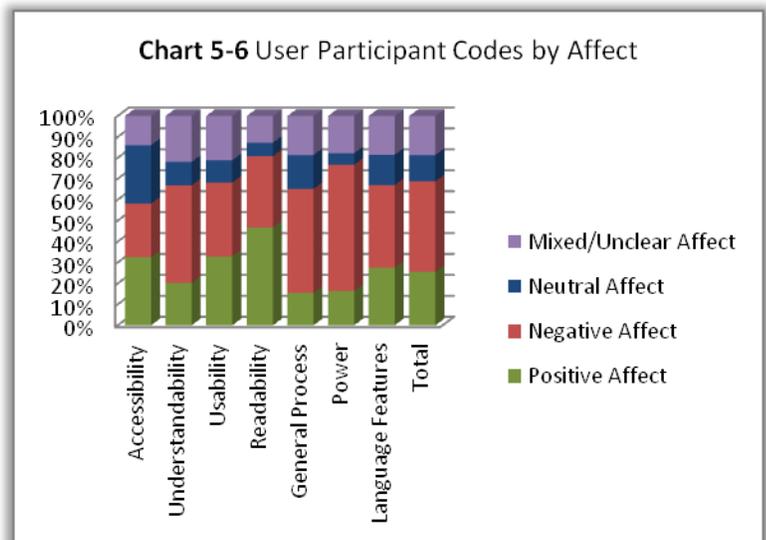
Disabilities" ("Disabilities") uses bulleted points and "it tells you exactly, explains the tips to get

it going. Excellent. Very much in plain English." Hence, the bulleted points are a specific design

feature of a document that he considers to be both excellent and in plain English. This design

feature facilitates his ability to understand the document, but comprehension is rooted in the

content, not necessarily based on the fact that it is presented in bullet form.

Other study users describe plain writing's characteristics as "[c]oncise, small, small words"

(FG2-4); accurate: "Get straight to it, and just to the point" (FG2-6); or multimodal: "Visuals are

good" (UI-4). But underlying these various definitions and descriptions of plain language is the

sense that it helps to make government documents more understandable for these readers. The

texts the study's users generally find easier to comprehend tend to have language features such

as those mentioned above. But the features themselves do not equate to plain language; rather,

the understandability of a text by way of such features equates to plain language. As UI-3

suggests, "[plain writing" is language that an elementary schooler can understand. . . . [s]omeone

with a small vocabulary can understand, or basic vocabulary."

The user participant formulation of plain writing departs from writer- and institutional-level

representations in several ways that have implications for USG plain language policy. First, both

the federal writers in this study and the 2013 compliance reports forward plain writing as a

function of language features, with writers frequently attending to understandability as well. A

text is plain if it has certain characteristics and, therefore, understandable. For user participants,

however, plain writing is writing they can understand. It may or may not have the characteristics

typically associated with the plain style, but their ability to comprehend a text, not its language

features, is what makes it plain. UI-1, for example, directly links plain language to

comprehension: "Plain meaning understandable," as does FG1-3, who describes it as "plain

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language that everyone can understand." For users, a text is not understandable by virtue of plain language characteristics; it is plain because it is understandable.

Additionally, both the writer participants and compliance reports forward plain writing qualitatively as writing in the EAE tradition. They do so implicitly and explicitly through expressions of their language beliefs, their language practices, and the language policy mechanisms that reinforce plain bureaucratic writing as clear writing, good writing, correct writing, or a combination thereof. Users, however, express plain writing in terms of how it supports their understanding of official texts and qualitatively (clear, concise, simple, etc.) only insofar as it facilitates comprehension. "The important thing is the statement in English. That it's clear enough for someone with a small vocabulary to understand what they [the government] want" (UI-3). The users in this study do not forward plain writing as writing in the EAE tradition, nor do they value it as "good" or "correct" writing. Rather, these users express understandable writing as plain writing and value it for the functions it performs.

5.5.   What Plain Language Does: The User Perspective

Spolsky posits that there are many and complex linguistic and non-linguist reasons for efforts to change language practices (traditional bureaucratic writing) and beliefs (traditional bureaucratic writing is good writing) (Loc. 225). Likewise, he says, "language and language policy exist in . . . highly complex, interacting and dynamic contexts" with which language management must contend (Loc. 222). In other words, the language beliefs and practices of individuals and entities at all levels of language policy interact in a multiplicity of ways— sometimes in ways that are not desirable—in response to language management efforts. As Shohamy points out, "language is personal and individual," so people use it the way they want and need to according to a given context (Loc. 387). As "practiced language policy" (Cassels

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Johnson Loc. 1561), i.e., the policy in language practices, user-level interaction with USG-

generated texts not only shows what plain writing does at the micro level, but it also reveals what

constitutes plain bureaucratic language for users. In the analysis that follows, I examine user

participant interactions with the study packet documents to determine whether, from their

perspective, plain writing does what the Act and plain language advocates say it should do: make

government information accessible, understandable, and usable.

5.5.1. Accessibility

The push for plain bureaucratic language—plain language in the bureaucratic context—

responds to what many commentators describe as the inaccessibility of traditional bureaucratic

language. Says plain language consultant Judith Gillespie Myers, "Traditionally, government

documents were written in legalistic, confusing language. Too often, this style resulted in reader

frustration, lawsuits, and lack of trust between citizens and their government" (Preface to *The

Government Manager's Guide*). This type of language, says, UI-1, is so complicated that not

only does it exclude EAL readers, but it is also too complicated for many whose first language is

American English. Plain bureaucratic language, as it is articulated in the Plain Writing Act, is

designed to counter the type of language that UI-1 and Gillespie Myers describe and increase

access to government information. However, as the analyses in Chapter 2 and Chapter 3 show,

federal writers and agencies pay little attention to accessibility in their plain bureaucratic writing

representations. Similarly, users pay far less attention to accessibility than to understandability or

usability.

When users reference accessibility, they talk about it in several different ways. For some,

accessibility means the physical ability to get to government documents: using the computer,

going to a government office, or getting a form in the mail. "The thing is, once you get to the

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[tax] form," says UI-3, "you need to fill it out, that the form, it's complicated to understand."

Here she indicates that finding the form is as much a challenge as understanding it and using it.

UI-2 says he prefers paper forms over computer-based formats, so he finds that government

information is increasingly less available to him, and FG2-1 does not own a computer, so he

sometimes has difficulty getting the forms or information he needs as well. For others,

accessibility means being able to find necessary information within a document: "They don't

want it to stick out. You gotta search for it," says FG1-2, about *VA Benefits in Brief* (*VA*

Benefits). In contrast, FG2-4 links accessibility to readability: "It's accessible and readable," she

says about *The Appeals Process*. She later says the document is "very accessible. The numbers,

and I like it how it's highlighted." So for FG2-4, if a document is readable in the sense that its

design features are appealing, it is also accessible.

The takeaway from these comments is that plain writing enhances accessibility, depending

on how both accessibility and plain writing are understood. When understandable writing is

considered to be plain writing, barriers to comprehension are eliminated; thus, the content is

accessible. If a document is organized and formatted in such a way that the reader can easily find

the information she or he needs and plain writing is understood in terms of readability or

document design, again, plain language facilitates accessibility. But if accessibility is the

physical ability to access a document, then plain writing falls short for many of the study's users;

hence, accessibility in this sense does not correlate with plain writing—and vice versa.

5.5.2. Understandability

The Plain Writing Act of 2010 states, "The purpose of this Act is to improve the

effectiveness and accountability of Federal agencies to the public by promoting clear

Government communication that the public can understand and use" (Sec. 2). Further, PLAIN

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notes, "Plain language means readers understand your documents more quickly. Readers call less

often for explanations. They make fewer errors filling out forms. They comply more accurately

and quickly with requirements" (*Plainlanguage.gov*). "Plain language," says Stephens, "means

information that is understandable" (*Plain Language in Plain English* 12). And as the Center for

Plain Language points out, "In a plain language document, people find information faster,

understand it more accurately, and are more satisfied with it" (*Centerforplainlanguage.org*). For

Cheek, there is a "moral imperative" inherent in plain bureaucratic language: "Citizens have a

right to be able to understand the regulations that govern their lives," she says ("The Plain

Regulations Act" 41).

   The users in this study reinforce the importance that so many plain language commentators—

and the U.S. federal plain language movement specifically—place on understandability. Indeed,

almost every user raises understandability as a problem, highlighting the consequences, which

are sometimes devastating, of not comprehending the contents of a communication or knowing

what to do with it. UI-3, an entrepreneur, notes that language was "a little bit of an obstacle" in

her first attempt to start a small business. "All the requirements and the things that I have to read

and to understand to start a business," she says, "So many . . . [r]equirements. And also you have

things to, papers that you need to understand: taxes, the IRAs." FG1-7, an Army veteran, agrees,

noting that he is not clear about what the Affordable Healthcare Act requires of him. "I don't

understand that if I had the employees, how many do I have to have before I'm taxed? And if I

have so many, what I'm going to need to do." UI-1 says, "sometimes, I ask an average American

[about a government document], and they'll say, 'I don't know.' Because sometimes it's so

complicated that even Americans don't understand! The language is so complicated." FG1-2's

colorful statement encapsulates what all user focus group and interview participants convey

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about the language in government documents: "I have had to fill out for Social Security; now

you want a trip? If you really want to trip . . . . Honey, let me tell you. You talk about something.

That's something there . . . . the questions are so twisted." These users leave little doubt about

the challenges government documents sometimes pose for them.

These challenges extend to the ways bureaucratic language can make it difficult for users to

apply for and get services and assistance. FG1-1, for example, recounts that when she was on

disability, she was unable to "make heads or tails" of the documents she needed to fill out. She

also had problems filling out the forms to apply for food stamps and, as a result, was turned

down several times before finally getting this benefit. Describing the difficulties she faces with

government forms, FG1-2 notes: "You know, sometimes you can read something, and it says one

thing—and it's almost like a mind twister." Similarly, UI-3 recounts her experience with

immigration forms as "very frustrating," and FG1-4 says that sometimes the effort required to

apply for a benefit is just not worth it. "There's a number of things that I haven't bothered to

apply for because I spend more time trying to go get a benefit than it would take to try to deal

with it on my own, to do without."

For FG2-3, the solution to the problem of incomprehensible bureaucratic writing is to break

it down "Barney style." Federal writers, he says, need to provide and ask for information in the

simplest possible way. For both UI-3 and FG2-3, this type of writing is limited to a basic

vocabulary, and FG1-6 offers, "[I]t should be something, where, hey, even my teenager can read

this and understand it." Almost to a person, these users state the need for government

information that they can easily read, understand, and use. "I don't know," says FG1-5, "why

they, you know, print things like this [complicated forms], but I'm glad that law [the Plain

Writing Act], however they're going to break it down, is in place because it really is important.

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Because like I said before, people have lost out on so much." User comments highlight that they view plain language as a necessity, as their right. And as the anecdotes above illustrate, when citizens do not understand a government communication, there is a risk that their lack of comprehension will prevent them from accessing the benefits and services they need.

At the same time, user participants acknowledge that their difficulties comprehending government documents are not all because of the complicated, formal, and jargon-filled bureaucratic writing that plain writing is supposed to fix. Some point to dyslexia (UI-2), attention deficit disorder (FG1-1, FG1-4), and various disabilities (FG2-1, FG2-2) as impediments to their ability to understand government documents. For some, literacy-related problems make comprehension difficult. According to National Center for Education Statistics, research on adult literacy conducted in 2003 shows that 12% of adults in the county where I conducted this research lack basic prose literacy skills.[19] FG2-4, who works in the student assistance office at a local college, makes the case for plain language as a response to literacy-related comprehension problems when she says, "[W]e have so many under-educated people that can't read or write and articulate the forms, so making them in plain English would be helpful for those that kinda is on a 6th grade, 8th grade level reading." She also notes, "If you don't understand a person that don't know how to read, you won't understand the frustration that they go through." To some extent, this frustration was apparent with several study participants, as noted in the "User Demographics and Language Practices" section above, and for FG2-4, plain writing is a good response to literacy-related challenges.

EAL participants, however, find that plain language does not always address the problems associated with what UI-1 describes as "discernment," the lack of cultural literacies that impact whether and to what extent people with diverse language traditions understand official texts,

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particularly those whose first language is not English. The EAL participants in the study point

out that cultural literacy is important to their ability to understand communications generally and

government documents specifically. UI-1, who is undergoing treatment for cancer, has

experienced difficulties with health insurance documents. For many EAL users, she says,

learning about insurance is like studying "rocket science." She also notes that after coming to the

U.S. in 2004, she looked up *mortgage* in her Russian dictionary and was unable to find an

equivalent. Although it is now becoming increasingly popular in Russia, until relatively recently,

people did not "own" their homes, so *mortgage* did not exist as a concept for Russians. For UI-1,

such contextually based knowledge means that EAL users of official documents get into trouble

because they sign paperwork they do not and cannot fully comprehend. They simply do not have

the necessary cultural literacies, she says.

UI-2 raises the same issue, suggesting that in addition to basic dictionary definitions, his

understanding of English words is based on what others tell him about their social and historical

meanings. Like UI-1, he initially struggled with concepts such as mortgage and credit cards

because the context in Iran, which has a cash economy, is completely different. UI-3 has a

similar perspective on the problem of cultural literacy for EAL users. But she adds that the

meanings of words and phrases also shift across English-speaking communities as well as being

different, and sometimes not translatable, from country to country. She points out that unlike

living in the U.S., in Venezuela, "You can live your life without filling out forms." Here, UI-3

highlights that what EAL users may expect to see in official documents does not always apply in

different cultural contexts, either to official documents or in the sense of "officialdom" as the

EAL user might understand it.

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These culturally based assumptions extend to EAL participants' understandings of official language and their ideas about what plain bureaucratic writing should look like and do. UI-1 and UI-2 express somewhat contradictory views about plain writing, despite their difficulties with the language and what those challenges mean (and have meant) in terms of official forms. Government language needs to be simpler, they argue, but at the same time, they say it should be formal. UI-1 believes that the government does not need to be in the business of "teaching A, B, C in your official papers," which, for her, is what plain bureaucratic language amounts to. On the other hand, she concedes that government writing should not hide behind big words or complicated grammar structures that even Americans whose first language is English cannot understand. Similarly, UI-2 agrees that the language in government documents should be "definite, but simple. Simple language, as simple as everyone can understand."

Although these EAL users acknowledge the need for simpler language, all three, UI-1, UI-2, and UI-3, argue that it is *their* obligation to attain the level of language competence and cultural literacy necessary to successfully navigate the documents they must use. "To survive," says UI-2, "you have to fit in. You can't find the easy way. You just have to manage it." Similarly, UI-1 argues that it is impossible to accommodate everyone's needs. "Every foreigner has different background anyway. So for some, you need this much of explanation; for others, you need ten pages of explanation." For her part, UI-3 notes that she always selects the English version of a form over the Spanish version because "we're in an English-speaking country, so we probably need to stick in there." For these study participants, whatever form challenges to understandability take, ultimately, users must address the problem, not the government. Says UI-1: "You don't change your documents because people don't understand them."

Another challenge to the understandability of government documents came up in several

forms during the focus groups: age. In a National Institute of Aging-funded study in the late

1970s, literacy scholars Sean Walmsley and Richard Allington found that their aging adult

participants appeared to be more easily distracted during certain reading tasks than the younger

participants (181). Jonas Persson and Patricia Reuter-Lorenz say that the declining cognitive

function characterized by this increased "distractibility" and slower reaction times are a normal

part of the aging process (591). As noted in "User Demographics and Language Practices"

above, FG2-8 is the only user in the study over the age of 75. He appeared to understand the

consent form, the purpose of the focus group, and his role in the study. His contributions to the

discussion, although minimal, were appropriate to the topic. Nonetheless, it took him much

longer than most of the other participants to go through the questionnaire, which he did not

complete, and he seemed also to need more time to consider the forms in the study packet. Any

number of factors could have contributed to his inability to complete the questionnaire and his

apparent difficulties with the documents in the study packet, including age. And with just one

elderly user participant, I cannot make any claims about the ability of elderly users to access,

understand, and use official texts. Nonetheless, several user comments convey concern that this

age group—a growing demographic (Kinsella and He)—faces unique challenges with regard to

government documents.

Making the case for additional resources to help users navigate forms, FG2-4 notes, "But I

believe agencies need those 2 or 3 people there. For those people who are elderly, are less

educated, people that help them." Here, FG2-4 represents older users as lacking and unable to

navigate government forms without assistance. Similarly, FG1-5 points out that "[a] lot of people

that read this too are older. You know, they're elderly. And it's like, it's too complicated for

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them." FG2-4 would agree, pointing out, "They can't help that they're elderly, and they don't understand this [form]." Such comments assume a link between age and reduced cognitive capacity. Although there is scholarship that contests representations of the elderly as less cognitively capable than their younger counterparts (See Hock, for example), these users' comments highlight the need for a better understanding of whether and to what extent plain writing impacts the ability of elderly users to access, understand, and use government texts.

User comments provide important and nuanced insights about what comprises understandability at this level of language policy as well as how users consider its relationship to usability and, to a lesser degree, accessibility. The comments also help to explain why there is a predominance of negative affect across the segments I coded for understandability. For these users, impediments to their ability to comprehend government documents, whether as a result of their own circumstances or difficult-to-understand writing, have material consequences that are sometimes devastating. At the most basic level, the lack of comprehension as it relates to official texts affects user participants' ability to obtain necessary benefits and services as well as to participate in the processes of governance. Thus, to the extent that plain writing facilitates comprehension—and most users indicate that it does—it accomplishes what the Act, its implementing guidance, and plain language advocates claim it does. However, as these users show, there are many challenges to comprehension that plain language alone cannot address.

5.5.3. Usability

User participants agree that, as FG1-1 puts it, "If you want us to do it, make it usable." For FG2-6, step-by-step instructions make the online Internal Revenue Service "Pay Your Taxes" document a usable publication. FG1-4 points out that anything produced outside the government is "fairly simple and pretty easy to use," a comment that suggests for information to be usable, it

must first be understandable. UI-3 agrees, "Because at the end of the day, if the questions are

confusing, it's gonna take me longer to fill out the form." Many users had difficulty with the

following paragraph from *Certificate* because of its language features, organization, and content,

which they struggled to understand:

> A spouse's insurance benefit may be payable for months between age 62 and full
> retirement age (FRA), even if you do not have in your care a child of the worker under
> age 16 or disabled entitled to a child's insurance benefit. Choosing to receive spouse's
> insurance benefits before FRA will result in a permanent reduction in your monthly
> benefits. Since such benefit will be at a permanently reduced rate and will continue at a
> permanently reduced rate even after FRA, the law requires that we obtain a certificate of
> election if you wish to receive the permanently reduced benefit. The amount of the
> reduction is 25/36 of 1 percent for each of the first 36 months from the start of the
> permanently reduced benefits to, but not including, the month you reach FRA. The
> reduction is 5/12 of 1 percent for each such month in excess of 36. In addition, if another
> beneficiary(ies) other than the wage earner (e.g., a student child beneficiary) is entitled to
> a monthly benefit on this Social Security number, election for a reduced spouse's benefit
> may cause a reduction in total monthly benefits. These reduced benefits may be paid for
> as many as 12 months before the month this certificate is filed. No reduced spouse's
> benefit may begin before the month you are 62. If you are eligible for retirement
> insurance benefits in the month this certificate takes effect, you will be considered to
> have applied for them.

UI-1 points out that some individuals might not be willing to sign a form such as *Certificate*

because of this presentation of the information, thereby making the form unusable. To the extent

that plain writing facilitates comprehension, then, such comments assume an understandable text

is a usable text. Conversely, FG2-1 indicates that even without understanding the content of this

paragraph, he would sign the form. The usability of this document for him has little to do with

how well he comprehends the text. Thus, there is not a one-to-one correlation between

understandability and usability in the plain bureaucratic context for these users, and even the

plain language document may not be usable, and for various reasons. Despite the fact that almost

all consider *The Appeals Process* to be a plain language document, including FG1-7, he indicates

that he does not know how to use the information it contains: "I don't know what an

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administrative law judge is. What am I supposed to do?" FG2-3 also considers usability apart

from comprehension, noting that multi-use forms can be confusing. For him, content,

organization, and style are not the problem; the purpose of the document is what makes it less

usable.

5.5.4. Does Plain Language Influence User Behavior?

User participants all indicate, to various degrees, that the more understandable a government

document (assuming it applies to them), the more likely they are to behave in ways that are

consistent with the document's aims—to the extent the text is also accessible, readable, and

usable. So the answer to this research question with regard to the study's users is "Yes," but it is

a qualified yes. How user participants say they respond (or not) to official texts is not as simple

as their ability to read and understand a document—although these are critical factors. On the

contrary, there are many things that user participants say influence their ability to use a document

in the way its writer intends. In addition to literacy-related challenges, the users in the study

highlight two additional factors that strongly influence their interactions with official texts:

power and process

Process plays an important role in how users respond to and interact with government

documents. Whether it involves knowing which form to fill out, where to send it, or how to get

assistance with it; having time to read a document and do what it requires; or having access to a

computer or the Internet, user participants say process has a tremendous effect on what they do

and are able to do with official texts. No matter how "clear, concise, and well-organized" a

document is, if the user cannot navigate the online environment (or does not have access to it),

cannot get through to a person on the phone when assistance is needed, or has no idea where to

get or how to submit the form, it is not usable. FG2-2 encapsulates the problem of process in her

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statement below, conveying what many other study users express about process and the textual

citizen-government interaction:

> [T]oday, I was doing my weeks [for unemployment], and um, just in the system itself. They just changed the system over, and to ask the same questions, and the same employer, you have to have your employer's EIN number, something they take you through, and you know, it becomes just redundant. And then if . . . just one little glitch, you know, then the whole thing is off, and you get frustrated. You go down to the unemployment office, and you got a certain amount of time on the computer. They can give you additional time, but it's just . . . And I can't halfway see sometimes, so I'm struggling.

As texts in context (MacCallum 15), government documents are situated in processes that are

essential to how plain language policy operates. In this regard, user participants point out what

should be obvious: a government document might be understandable, but if the process it is a

part of is flawed, redundant, inefficient, etc., we are left with an understandable document in a

flawed, redundant, inefficient, etc., system. We might be able to understand the document, but

that does not mean we can use it.

Users' process-related comments typically reference three elements:

1) System—finding, accessing, using, and submitting a particular form,

2) Assistance—getting help with any aspect of the form or process, and

3) Time—having time to read and respond appropriately to government communications.

Nearly every user in the study has an anecdote about accessibility, understandability, or usability

in which process plays a fundamental role. UI-2, for example, claims that his citizenship was

delayed because he inverted two digits on one of his forms. Since he was unfamiliar with the

process and the USG's structure, he did not know how to fix the problem. FG1-1 tells of her

difficulties obtaining food stamps because she did not know how to fill out the form correctly,

and FG1-4 recounts how he was penalized because a government official submitted a form in

error. FG2-3 describes his experience submitting his wife's immigration paperwork to an

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embassy and waiting for acknowledgement that he had correctly submitted the proper

documents—acknowledgement that he never received. In each of these stories, process is

inextricably linked to user participants' ability to access, understand, and use government forms.

Many users in the study indicate that they have sought assistance with government forms

from various sources to resolve the types of problems outlined above. In fact, every user except

FG1-3 says he or she routinely seeks some type of assistance with government documents, and

FG2-5 says he will not fill out any official document without first consulting with someone who

knows government forms and processes. FG2-2, for example gets help from the organization that

set up and hosted the focus group in which she participated. FG2-1 relies on his doctor, but he

also uses legal professionals to help him fill out and file government forms, as have FG2-8 and

FG2-5. FG1-4 and FG1-5 both rely on the Internet to help them navigate government forms, and

FG1-2, FG2-3, and FG2-5 have all sought help from government agencies. FG2-4 and UI-2 turn

to local organizations for assistance, while UI-2, UI-3, FG1-1, and FG1-6 say they routinely rely

on family and friends to help them understand and use government forms. In fact, UI-2 states

that he never submits official paperwork without first having friends or professionals look at it,

"the more, the better."

Regardless of age, education, experience, and language tradition, virtually every focus group

and interview participant in the study wants someone look over the forms she or he fills out or

requires assistance with government documents. Users find other users who have developed

"workarounds" for forms and processes that are difficult to navigate: "So when someone else

who was helping me go through it [application for food stamps] again, she said, 'I don't know

why she did that. I don't know why you got turned down.' And she filled it out, bip-bip-bip-bip,

boom! And I got them" (FG1-1). They also hire people who have come up with payment plans

that accommodate a range of financial circumstances: "Get one of those attorneys who don't get paid unless they win" (FG2-5). Still others find themselves on either the giving or receiving end of "the poor and needy helping the poor and needy" with official documents (FG2-1). The many non-profit and for-profit organizations, government resources, and informal networks that exist to help people access, understand, and use government documents indicate not only that bureaucratic language is a problem for users but also the processes in which a document or form operates.

Some users point to time constraints as an important factor in their ability to access, understand, and use government documents. Some are single working mothers (FG1-5 and FG1-6), some are full-time employees as well as full-time caregivers (FG1-3 and FG1-6), and some juggle jobs, school, and family (FG1-4, FG2-3, and FG2-4). Some live in locations that make it difficult and time-consuming to get transportation (FG2-1), while others cannot drive (FG2-2). Thus, when a government form is hard for such users to understand, it requires extra time that they simply may not have. FG1-5 and FG1-6, both mothers with young children, explain that between work and childcare responsibilities, they just do not have the time it takes to read and understand the government documents they receive. "If I get ten minutes to listen to the quietness around me is doing good" (FG1-6). Such comments remind us that there is much more at stake in bureaucratic plain language than active voice, personal pronouns, and effective use of white space. As is the case with language, time matters. If users do not have the time it takes to work through a form they do not understand, then they may—and do—behave in ways that are not in their best interests and conflict with what the government wants them to do.

Users sometimes do not have the resources, whether time, money, or adequate literacy skills, to work through a document or get help with it when they do not understand or cannot use it. In

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such cases, some respond by making use of what FG1-6 calls the "G file." "When all else fails," she says, "it [government document] goes in the G file, the garbage can, and I just pray that it wasn't important." FG1-6 is not the only user in the study who throws away government documents that she does not understand. FG1-5 indicates that she does the same thing, and FG2-6 says she too tosses out government forms she does not understand. FG-1 and FG-4 both admit to setting aside documents they do not understand—then forgetting about them and missing important deadlines. FG2-4, however, offers another take on why users relegate government documents to the G file, whether literally or figuratively. Sometimes, she says, users "just think they're [the government] just really trying to be nosey. You're going to close it out. I don't want it. And then you and your family going homeless, with no food stamps." In such cases, users perceive the questions on a form as an intrusion into their lives and, in response, G file the document.

Whether system-, assistance-, or time-related, these user participant comments illustrate the profound impact process has, not only on how citizens use forms but also on what it takes to access and understand them: time, resources, literacy, and even social capital. Government forms are more than simply plain words on paper for users. They are also the institutions users must navigate: "'Well, you know, somebody wrote on here.' And they're like, 'But it's printed here' [taps finger repeatedly and forcefully on table] . . . . it just makes you feel really stupid" (FG1-4). They are the call to the help center that does not go through: "I don't really have problems with the forms themselves . . . . It's just the help on the phone" (FG2-3). And they are the task that does not get completed because it requires more time than a user can spare: "I'm taking care of her [wife with Parkinson's disease], run the house, run the storeroom. I just really don't have

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time to sit there and read [government documents]" (FG1-3). At the same time, official texts

represent the government's authority over citizens.

In his discussion of institutional dialogue, van Dijk notes that interactions with and within

organizations "enact, display, signal, or legitimate a multitude of power relations" (47). For

McCarty, policy is another "practice of power that operates at multiple, intersecting levels,"

including at the "micro level of individuals in face-to-face interaction" (Loc. 314). As many of

the comments from the focus groups and interviews show, users often perceive government

documents as instantiations of the citizen-government relationship. It is a relationship that many

users in the study express as a reflection and perpetuation of unequal access—to power, to

resources, to ways of being. Regardless of the form the government-citizen relationship takes for

user participants, their interactions with the USG through official texts are laden with

assumptions about authority and power differentials. Some users in the study view forms that are

difficult to understand as the government's attempt to 1) discourage them from applying for

benefits or services, 2) hide important information, 3) intentionally confuse them, or 4) put (or

keep) them in their places. Others presume ethical behavior on the part of the government and do

as official documents direct, regardless of their ability to understand those texts or the

consequences associated with them.

Some users, such as FG2-5, distrust the government: "When I came back from overseas

[Vietnam], the way my country treated us when we came back, I want nothing to do with the

government." As a result of this distrust, FG2-5 indicates that he is inclined to ignore

government forms. Several users in the first focus group are also suspicious of government

agencies' intentions. FG1-7 suggests that the Veterans Administration is trying to "hide"

information from users in a section of *Veterans Benefits* he found hard to read. Additionally,

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FG1-3 says, "The way this [*Certificate*] is looking, it's like the government is wanting you to be

confused and basically give up on filling anything out." FG1-5 also questions complicated

government language:

> But just all this run-on stuff, it's just really ridiculous. And then you lead people to
> believe things like, you know, what she [FG1-1] said when she got up that, you know
> there's something else to it, you know? The system, you know, whatever system it is,
> doesn't really want us to really understand. They want us to continue to be incompetent,
> you know, not know anything.

Other users, however, do not question the apparatuses behind government documents or the

systems in which they operate. Of all the user participants in the study, FG2-1's comments

reflect the most positive affect (the reverse is true of FG1-4's comments). And while FG2-1 is

decidedly negative about and mistrustful of local officials and organizations, his comments about

federal government forms exemplify his confidence in USG institutions. For instance, he notes

that he generally does not read the fine print in documents because "They [the USG] have their

reasons." He later admits that he also does not read forms carefully; he just signs them. Both his

actions and his words indicate a high level of confidence and trust in the USG. FG2-3 also

implies his confidence in government institutions and processes, saying, "I can see how it's a

necessary evil," when discussing a block of text in the *Decision Review* form that confused many

other users. Additionally, UI-4 expresses confidence in the government, noting that she does not

read documents closely, trusting that they are designed to do what their titles indicate they are

meant to do.

At the same time, some users articulate conflicting views of governmental authority. FG2-3,

for example, expresses frustration with "disgruntled" government employees who have the

power to process a form or toss it into a pile. Yet he defends their authority by pointing out, "I

remember that the person who's there to help is . . . I give them the benefit of the doubt that

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they're a good, helpful person. So I treat them accordingly, and I don't treat them like they owe

me something. And in return, I think they appreciate that." FG2-3, it seems, sees himself as an

equal participant in the citizen-government dynamic. But FG1-5, by way of her suggestion that

those in power want "us to continue to be incompetent," obviously views herself as subjected to

the authority of government bureaucrats. These comments illustrate how beliefs about the

government-citizen relationship shape perceptions of official texts, their content, and their

functions as well as user views of governmental entities in the context of bureaucratic language.

User statements also convey in such statements their understandings of how bureaucratic

language operates and to what ends.

   In sum, users in the study say plain language does or is likely to impact their behaviors with

respect to government documents—at least in principle. When a document is understandable,

they are more likely to consider what it is directing them to do. But the document must first be

accessible in the sense that they can find it, readable in the sense that the information is presented

in a way that makes it possible for them to interact with and work through the text, and usable in

the sense that they can do what the document directs them to do. But their ability to access, read,

understand, and use documents extends well beyond the texts themselves. The processes

surrounding the document, at a minimum, must not impede their access to a text or their ability

to read, understand, and use it. Further, the power relations such documents represent also impact

how users interact with an official text and to what degree of success. If users presume a text is

designed to discourage them from obtaining information, benefits, or services, it stands to reason

that they would be disinclined to interact with it. A document might be written according to plain

language principles, thereby making it clearer and more concise, but if a particular citizen-

government relationship is configured such that the user feels disempowered, the absence of

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jargon or passive voice, at least for the users in this study, is not likely to fix the problem. Similarly, if the process or system within which an official text operates is flawed or impedes user engagement with a text, plain language can only do so much to remedy the situation. As WI-5 puts it, "Bad practices, written intelligibly, will still be bad practices."

5.6.   Postscript: The Material Costs and a Plea for Plain Writing

During the data-gathering stage of this study, a friend who had recently retired told me about his experience with Medicare Part B. Not understanding what he was supposed to do with the forms, he made a mistake that cost him several thousand dollars. My friend is a Ph.D. and has published widely. By anyone's account, he is an expert reader and writer. Yet he was unable to correctly navigate the Medicare paperwork. Similarly, many users who participated in the study have stories of their inability to obtain benefits and services or the ways they have been penalized as a result of their failure to understand or use official documents. FG2-5 notes, "The way the government is, you get one sentence wrong it's gonna screw up the whole thing." FG1-2 agrees. She made an error in her unemployment paperwork that resulted in her payments being stopped. FG1-4, who misread the due date on some child support paperwork, describes the problems resulting from his error, including lost wages, fines, court dates, and the accidental suspension of his driver's license, which, in turn, affected his ability to work. "It all comes down to that first form," he says, "I'm $18,000 in arrears because I didn't understand [the date on] that first form."

Plain language literature is full of examples that show how plain writing cuts costs to organizations (see Kimble, *Writing for Dollars* 103), increases compliance (*OMB Final Guidance* 1), and reduces the risk of lawsuits (Gillespie Myers, *Plain Language in Government Writing* 18). But the user participant anecdotes above demonstrate that the price of unclear

writing in government documents amounts to much more than too many calls from users who need more or better information or burdensome financial demands on federal government organizations. Documents that are inaccessible and hard to read, understand, or use also cost *users* time, money, and reputation. Unclear and unusable government communications create obstacles that can prevent citizens from obtaining much-needed benefits and services. Difficult-to-read texts and convoluted processes also interfere with users' ability to respond appropriately and constructively to the needs and requirements of the government. And overly complicated documents cost the government good will. When users do not understand or cannot use an official text, they are likely as not to "feel stupid" (FG1-5), suspect the government of "hiding something" (FG1-1), or fail to follow through with what the text is asking of them (FG1-4). These costs are impossible to quantify, but their impact on users, the government, and the citizen-government relationship is profound and, therefore, must be considered in analyses of plain language policy.

At the end of each focus group and interview, I asked participants what they wanted to convey to federal writers about government documents and plain writing. Every user had advice about plain language and the practices they find most useful. Their suggestions range from format-related concerns (use bullet points) to information design (give me the bare minimum and options to click for more information) to how to make documents more understandable (make it clearer, more concise, use plain English). But all user participants agree on one thing: the need for plain language. As FG1-5 notes so compellingly, "[S]o many people have gotten screwed with like, just different things: credit, loans. Because it's just this little, little stuff . . . . it's really not fair. It's not fair." User participants agree that plain writing that is clear, concise, and simple; plain writing that uses everyday words, short sentences; and plain writing that incorporates

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document design features such as bulleted lists, plenty of white space, and headings is writing

that will, along with other factors, *help* to make documents more understandable and, thus,

usable for them. As FG2-4 says, "Before I sign, tell me what's this, IN PLAIN ENGLISH,

MA'AM!"

Chapter 6. The "Real" USG Plain Language Policy

"For all that can possibly be required of language is, to convey our ideas clearly to the minds of others, and, at the same time, in such a dress, as by pleasing and interesting them, shall most effectually strengthen the impressions which we seek to make" (Blair 67)

6.1.   Introduction

This dissertation research sought to answer three questions:

1) What is plain writing in the bureaucratic context and for whom?

2) How does pain language legislation affect the work of the USG, specifically, federal

   writers?

3) Does plain bureaucratic language influence how users respond to USG texts?

In the preceding chapters, I examine the various and sometimes conflicting ways plain writing is

represented—by plain language experts and commentators (Chapter 1), federal writers (Chapter

3), USG agencies (Chapter 4), and the citizens who use the texts the USG generates (Chapter 5).

The study findings show that plain language legislation does not affect the work of most writers

in the study or their ability to do it. Nonetheless, user participants generally prefer plain language

documents to non-plain language documents. Additionally, they are more inclined to do what a

government document intends for them to do when they understand it—depending on many

other factors, including their ability to navigate the processes in which a text is situated, their

sense of the citizen-government relationship, and their level of literacy.

In this chapter, I examine what the study findings suggest for U.S. plain language policy,

arguing that the "real" plain language policy differs from the policy documented by the Plain

Writing Act of 2010. Further, while plain bureaucratic writing can help to make government

documents more understandable for users, plain writing alone cannot achieve the Act's goals.

Moreover, the number of plain language features in a document does not determine how

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accessible, understandable, and usable it is. Rather, usability is the most reliable measure of a

text's accessibility and understandability. Plain writing is a *style* of writing. As such, it is

subjective, contingent, and based on preference, which is impossible to legislate.

6.2.   What Is "Real" USG Plain Language Policy?

Shohamy posits that language policy exists in the space between language beliefs (traditional

government writing is bad writing; plain language is good writing) and language practices (plain

language techniques), arguing that it is effectuated by mechanisms that operate implicitly as well

as explicitly and are usually used by those in authority (Loc. 206-210). These policy tools, says

Shohamy, "contribute to actual policies and language realities" (Loc. 243). The mechanisms that

are based on and forward plain language, the beliefs on which they are based, and the practices

they engender represent the "real" USG plain language policy, which diverges in several ways

from the policy the Plain Writing Act of 2010 articulates. The Act defines plain writing as "clear,

concise, and well-organized" writing that "follows other best practices appropriate to the subject

or field and intended audience" (Sec. 3 (3)). While users, writers, and the 2013 compliance

reports usually use some combination of these elements to describe plain language, the "real"

plain bureaucratic writing they forward takes two distinct forms, each with a different basis and a

different emphasis. The two forms, while not necessarily contradictory, create a number of

disjunctions across the various policy levels that limit the effectiveness of plain bureaucratic

writing and impede the accomplishment of the Plain Writing Act's goals.

6.2.1. What Plain Bureaucratic Writing "Really" Is: Institutional and Writer Levels

At the institutional and writer levels, plain bureaucratic writing is standard written English in

the plain style. It is a conflation of writing quality (good, clear, correct, etc.) with writing style

(plain, bureaucratic, etc.), as characterized by specific language practices (use of active voice,

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short sentences, and proven information design techniques, etc.). This view is reflected at the

institutional and writer levels by the predominance of references to language characteristics and

an emphasis on the quality of writing. Plain writing in the bureaucratic context is good writing

because it uses personal pronouns, puts the main point first, has plenty of white space, and

adheres to the conventions of EAE. Good writing, then, is both in the plain style and adheres to

the principles of EAE and all they imply in terms of correct grammar, proper punctuation, and

appropriate usage. This conception of plain bureaucratic writing also means bureaucratic writing

that diverges either from the plain style or from EAE is "bad" or "incorrect" writing that needs to

be fixed. That is to say, EAE is indissociable from this version of plain bureaucratic writing.

Additionally, plain bureaucratic writing at these levels of policy is a writer-contingent construct,

whereby those who produce a document (the federal writer and his or her institution) determine

whether or not it is a plain language text. If the writer uses plain writing techniques, as they are

grounded in EAE, the text is considered to be in plain language.

6.2.2. What Plain Bureaucratic Writing "Really" Is: The User Level

Unlike agencies and federal writers, user participants do not identify plain bureaucratic

writing either by how well it adheres to the principles of standard written English or the

characteristics typically associated with plain language. Rather, if a government document is

understandable, it is a plain language document, regardless of whether or to what extent it has

plain language characteristics or conforms to EAE. Furthermore, users approach plain writing as

participants in the communicative event, not simply as recipients of a text that has already been

designated as a plain language document. Whether or not the writer or agency determine a text as

plain by virtue of certain language features (and, therefore, understandable) is irrelevant to the

user who cannot understand it. "Plain English," says FG1-7, responding to my question about

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what plain writing is for the users in his focus group, is "where I can understand it. . . . Because if [I] can understand it, anyone can understand it!" He is the arbiter of what constitutes plain writing, negotiating the text's meaning with the writer based on the context in which the communicative interaction is situated and the document's content, organization, and design.

6.2.3. Plain Language Policy Disjunctions

These different appropriations of plain language policy pose several problems for those who must implement the Plain Writing Act's requirements, for the citizens it is designed to benefit, and for efforts aimed at determining its efficacy. First, the view that plain bureaucratic writing is standard written English in the plain style presumes that standard written English in the plain style is also understandable writing. The oft-quoted description of plain writing as writing a user can understand the first time he or she reads it couples comprehension (and readability) with this grammatically correct, good writing in the plain style. The problem with this understanding of plain bureaucratic language, however, is that good writing according to the plain bureaucratic writing standard can sometimes be difficult even for the intended audience to understand. User comments about the Census Bureau website illustrate that there is not necessarily a one-to-one correlation between plain bureaucratic writing and understandability. The Census Bureau indicates that is has long had a "commitment to clear communication with the public" (*2013 Compliance Report* 1). However, several users had difficulty understanding the information on its website's homepage, noting that it is confusing (UI-3) and has "too much going on for me to focus on any one section" (UI-4). The homepage may adhere to both the plain style and EAE, but at least for these users, plain bureaucratic writing does not ensure that the text is understandable.

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WI=Writer Interviewee   UI=User Interviewee

Additionally, the version of plain bureaucratic writing forwarded at the agency and federal

writer levels is based on the flawed assumption that standard written English in the plain style is

as accessible to the public as it is to federal writers and, therefore, as understandable. On the

whole, however, there is a significant difference between federal writers' access to and facility

with the EAE standard and that of the broader public for which they produce documents *based

on this standard*. This gap is important to the extent it impacts—whether negatively or

positively—textual government-citizen interactions. Federal writers in the study, for example, all

indicate that they have had some type of post-secondary writing instruction. More than 60% have

had workplace training in editing, 25% have had college-level instruction in plain writing, and

54% have had work-related plain language training. Additionally, 75% have had workplace

training in professional writing. These writers, 71% of whom have graduate degrees, are highly

trained in various forms of writing. In contrast, none of the users who took part in the focus

groups and interviews have a graduate degree, and just 28% have undergraduate degrees.

Table 6-1. Study Participant Self-Ratings of Reading and Writing Abilities				
Rating	Reading/Writers	Reading/Users	Writing/Writers	Writing/Users
Excellent	83%	28%	71%	18%
Above Average	17%	22%	29%	29%
Average		33%		35%
Below Average		6%		6%

This is not to say, of course, that education and training are the only means by which writers

(and readers) develop EAE competency and facility with plain bureaucratic language. Rather, the

point is that these writers and users, collectively, have two vastly different bases from which to

determine what constitutes writing qualities. Therefore, it is unrealistic to think writer-based

determinations of what is plain, hence, understandable, are the same as user-based

determinations. A comparison of participants' self-ratings of their language competencies is

telling in this regard. As Table 6-1 above shows, all the writers who participated in the study

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

give themselves the highest marks for their reading and writing abilities, while user self-ratings

are lower and more broadly dispersed across the rating categories. The writers in the sample set

are very confident in their reading and writing abilities, while users tend to describe themselves

as average and, to a lesser degree, above-average readers and writers. It is reasonable, then, to

assume that producers and users of government texts do not relate to plain writing the same way,

have the same (or similar) expectations for plain language documents, or even have the same

conceptions of good, correct, grammatical, or plain writing.

WI-1 illustrates the dissonance that can result from the idea that standard written English in

the plain style is (or should be) as understandable to the general public as it is for those who

produce USG documents. He explains that the U.S. has "accepted" writing standards [i.e., EAE],

and those who cannot comprehend writing that adheres to these standards, individuals whose

literacy levels are such that even simple tables are difficult for them to navigate and understand,

constitute a "special group" whose language needs must be handled in "special ways." These

individuals, explains WI-1, are not the general public for which the Act is designed to make

government communications clearer through the use of plain language techniques. The study

findings, however, show how writer conceptions of understandability insofar as they relate to

these accepted standards can be far removed from those of the general public. Some users had

difficulty understanding study documents, even when written in the plain style, and the

documents generally all conform to the EAE standard. These users represent the diversity of

demographics and language practices that exists across the general population (See

"Introduction"). They are not a "special group" in the sense that their facility with the language

is the main impediment to their ability to comprehend a government document, although it

certainly can be. But the various ways they interacted with the study texts highlight that their

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

ability to understand these texts is affected by far more than literacy levels or how the documents

adhere to EAE or the principles of plain writing. Context is also a key factor, but the agency and

writer version of plain bureaucratic writing fails to account for it, relying instead on plain

language features to make texts more accessible, understandable, and usable for this general

public.

Van Dijk argues that every communicative event is unique since each participant brings his

or her history, values, and judgments to bear on a text (St. Petersburg Lecture). From van Dijk's

perspective, every person has a unique "mental model" that determines how she or he interacts

with a text. Thus, users approach government documents based on a variety of experiences,

knowledge, preferences, views, and linguistic practices and competencies, etc., all of which

determine how they access, understand, and use official texts. These interactions will inevitably

be different, and the results, therefore, may also be different. So when a user is unable to

understand a text written according to the accepted principles WI-1 mentions, it does not

necessarily signify membership in a special category that comprises individuals who cannot read

or write adequately, for example. Rather, the study results reinforce the point Schriver made at

PLAIN International's 2013 conference when she noted the many factors that complicate and

influence audience, including age, experience, tech savvy, native language, and reading ability,

among others.

Finally, the agency-writer formulation of plain bureaucratic language rests largely on its

form, not its function. As is the case with plain language literature generally, the Act articulates

plain language in terms of both form (clear, concise, well organized) and function (accessibility,

understandability, and usability). However, the real plain bureaucratic writing at the institutional

and federal writer levels, standard written English in the plain style, reflects an approach to

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

language policy that prioritizes what plain language *looks like* by virtue of its constituent parts, i.e., language qualities and characteristics. A text is more or less understandable to the extent these constituent parts are evident, given the assumptions noted above, but understandability is a byproduct of the real plain bureaucratic writing at these levels of policy, its inevitable outcome. In contrast, function, not the characteristics of the plain style, is the user-level focus. For them, plain bureaucratic writing *is* understandable writing. Thus, the plain bureaucratic writing paradigm is inverted between the user level and the institutional and federal writer levels. For the latter, it is form first, then function; for the former, the reverse is true.

6.3.   What USG Plain Language Policy Does—and How

Not only does the real USG plain language policy differ from the policy articulated in the Plain Writing Act of 2010, but it also operates in ways that diverge from the Act's stated goals. Moreover, plain language policy does different things at the institutional, writer, and user levels. Hence, what constitutes success with respect to the Act—as well as how success is measured— varies accordingly. For its part, the Act requires USG agencies to write all covered documents in plain language in order to facilitate government communication by making information more accessible, understandable, and usable for citizens. The study results establish that, at best, it is unclear whether or to what extent these goals have been met as a result of plain bureaucratic writing or even if the Act helps federal writers in their efforts to produce such documents. To be sure, some agencies are complying with the Act's requirements, which, ostensibly, support its objectives. But there is little evidence that shows how their efforts have improved government-citizen interactions vis-à-vis official texts beyond increased adherence to standard written English in the plain style.

SR=Survey Respondent   FG=Focus Group Participant
WI=Writer Interviewee   UI=User Interviewee

6.3.1. How Plain Language Policy "Really" Operates: The User Level

At the user level, plain language policy does several things. First, it encourages citizens to use government documents in the way the writer intends, although it does not guarantee that they will. In the process, it responds to user concerns that are not directly related to a text but still affect how they interact with it. I note in Chapter 5 that context is key to user interaction with government documents, particularly with respect to the processes in which the texts are situated and user perceptions—sometimes negative—of these official documents as instantiations of government authority. Plain bureaucratic writing, which is forwarded as understandable writing at the user level of policy, ameliorates some of these problems. It is not only understandable writing, but in some cases, it helps to make the information in government documents more accessible and even usable as well. For the users in the study, plain bureaucratic language also serves as form of good will. It signifies the government's willingness to help citizens as opposed to preventing them from accessing information and services. From user participants' perspective, plain language also responds to ethical concerns—"It's not fair [when users cannot understand complicated writing]" (FG1-5)—as well as to the lack of trust and confidence hard-to-understand documents often generate. User participants' message to federal writers and the USG is that, not only do they want plain language in government documents, but they also need it. However, they need plain writing in the sense that it operates for them: as writing they understand, regardless of its form.

6.3.2. How Plain Language Policy "Really" Operates: Institutional and Writer Levels

At the institutional and writer levels, plain language policy de-emphasizes the function of plain language, focusing primarily on its form instead. It reinforces EAE as the standard for government writing and, at the same time, institutionalizes the plain style as not only the

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preferred style but also as good government writing. This is not to say that plain bureaucratic language at these levels of policy ignores the Act's goals of enhancing understandability—although accessibility and usability get relatively little attention in the data generated by this study. However, plain language policy is appropriated in such a way that it mainly addresses writing, not what that writing accomplishes in terms of the textual government-citizen interaction. Further, the writing that plain language policy addresses is traditional bureaucratic writing, which is routinely described as bloated, overly complicated, and bad. Thus, plain bureaucratic writing becomes, first and foremost, the means to "fix" this bad government writing. The idea is to correct bad grammar, eliminate complex sentences and legalese, and apply the principles of good information design by way of plain writing techniques in order to address the problems associated with traditional government writing.

6.3.3. Effectuating Plain Language Policy: The Mechanisms

There are numerous mechanisms at the institutional and writer levels that both drive and are driven by plain language policy: document templates and style guides, review and clearance processes, training, and employee performance-related practices. Like their counterparts in the private sector, many USG agencies enculturate new employees through, as the National Park Service calls it, "onboarding" (4) programs and orientation training. A number of government agencies have built plain writing instruction into this training (Department of Labor, National Security Agency), and others use pre-employment screening processes to weed out those individuals who do not have plain language competencies (Department of Defense). Additionally, all agencies are required under the Act to provide plain writing training, and much of this training relates to grammar (Defense Contract Audit Agency), common usage

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(Department of Commerce), and punctuation (Department of Justice), thus reinforcing plain

bureaucratic writing as standard written English in the plain style.

In addition to training, there are other ways agencies [rein]force plain bureaucratic language

as standard written English in the plain style, namely, through human capital management

techniques such as employee performance ratings (Census Bureau) and rewards programs

(Agriculture). From WI-2's perspective, if employees are not "punished for doing it [plain

bureaucratic writing] wrong or rewarded for doing it right," there is no incentive to change

language practices unless there is personal involvement or an employee has a passion for plain

writing. Hence, federal writers are commended for their willingness and ability to adhere to the

plain bureaucratic writing standard, and plain writing facility becomes a benchmark against

which supervisors judge how well (or not) an employee is performing her or his job-related

duties. Document review and clearance processes also advance the real plain language policy

agenda, ensuring that plain bureaucratic writing is managed from the top of the organization

down to the most junior employees. Similarly plain writing templates and style guidelines

enframe federal document production such that texts are written in specific, regimented forms.

The mechanisms that reinforce and drive plain language policy at the user level take several

forms as well. First, there are the documents themselves, which are instantiations of both

government authority and institutional/federal writer language beliefs and practices. As such,

they represent a version of plain bureaucratic language that requires, if not facility, at least

competence with EAE. The degree to which users are able to use official texts to apply for

benefits and services as well as to comply with government requirements signals to federal

writers and agencies whether or not their texts are working, hence, the effectiveness of their

language practices. If users appear to be interacting with and responding to texts as the USG

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intends, their behaviors reinforce the version of plain bureaucratic language that is standard

written English in the plain style. However, as the study findings show, there is far more to the

government-citizen interaction than the words on paper, regardless of the document's design,

organization, or style of writing. Process-related mechanisms—the entities that assist users with

their government documents, for example—further reinforce and drive plain language policy. It

may appear that a text is effective when, in fact, users are relying on third parties to navigate it

because the language (plain bureaucratic writing, for example) makes the document difficult to

understand or use. Thus, the third-party entities that have sprung up to assist users with

government texts also serve as policy mechanisms.

These policy mechanisms operate both implicitly and explicitly. For instance, on the one

hand, the review and clearance policy is an overt mechanism; it is an acknowledged, often

documented, component of an organization in terms of structure and process. At the same time,

the language beliefs of those who must clear a text are implicit in the decisions that get made

about what to take out, leave in, and change. As a result, the clearing official's attitudes about

language drive how the provisions of the Plain Writing Act are appropriated. Similarly, the

training that organizations offer or federal writers choose speaks directly to their views about

language and the relationship of EAE to plain writing. When plain writing training is built

around EAE-based conceptions of grammar, punctuation, and usage, it implies that the one is

coupled to the other. Additionally, as WI-1 points out, users are not used to demanding clarity in

official documents. When they do not know how or where to go to make the case for clearer

government communication, their lack of knowledge about the structures of government and

perceived power inequities help to reinforce and perpetuate the linguistic status quo.

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6.3.4.   What Plain Bureaucratic Writing Does Not Do

This analysis of how plain bureaucratic writing operates at the various levels of policy and toward what ends demonstrates that, as some critics argue (See Assy, Barnes, or Bennion, for example), plain language's capabilities are overstated. Plain language writers do not, as the Center for Plain Language claims, "communicate effectively because they understand who will (and will not) use the document or website they are writing" (*Centerforplainlanguage.org-* updated). On the contrary, there are many factors that influence why writers are able to communicate effectively with an audience, including the way the audience interacts with the text. Plain language *helps* writers to communicate more effectively through proven techniques and by highlighting the importance of audience to the communicative event. Writing is not necessarily in plain language if, as PLAIN contends, an audience is able to find and understand what they need, then use it to meet their needs (*Plainlanguage.gov*). Rather, plain language is one of *many* linguistic strategies that help the reader to negotiate and then leverage meaning toward a desired end.

User participants agree that plain language generally helps to make official texts easier for them to understand. But no matter how plainly a bureaucrat writes a document, the plain language he or she uses cannot alone fix an ineffective process or a user's literacy-related challenges. The plain language document itself does not resolve issues related to the citizen-government relationship that impact how the user interacts with the text. Further, user participants show that plain language does not necessarily make official documents more accessible or usable. Factors such as access to computer, Internet, and printing resources; a user's rhetorical framework (e.g., a tendency toward deductive or inductive reasoning); and social, technical, and financial literacies, among others, all work to determine whether and to

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what extent a document and the information it contains are accessible. Likewise, all these (and

other) factors work together with a document's understandability and accessibility to determine

how usable that document is. Plain language, as the users in this study reinforce, is a valuable

resource, but it alone does not ensure a document is accessible or that users can understand the

information it contains such that they can use it to do what needs to be done. Plain language

helps to make government information understandable to the public. Plain language is just one

part of a complement of factors that help federal writers and agencies to produce clear

information that the public can access and use, not the sole causal factor.

6.4.   Plain Bureaucratic Language—For Whom?

Another study finding that has implications for USG plain language policy is that there are

differences across all the policy levels with respect to whom plain bureaucratic language benefits

and how. The Act is clear: plain bureaucratic writing is supposed to benefit the public to the

extent that it makes government information more accessible, understandable, and usable. The

Office of Management and Budget's implementing guidance makes the same point, but also

notes the benefit to the government in terms of citizen behaviors such as compliance. While the

Act, compliance reports, and writers all formulate plain writing as audience-centric writing, plain

bureaucratic writing is often as concerned with agency and writer issues as it is with audience,

and sometimes more.

Writers pay special attention to audience, but overall, compliance reports tend to address the

needs of agencies and writers more than audience-related concerns. To be sure, some reports

mention audience, and the audiences for particular documents are listed in those reports that use

PLAIN's template. However, the reports emphasize *the fact* that agencies have implemented the

Act's requirements, not how or the extent to which information is [more] accessible,

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understandable, or usable for audiences because agencies have met those requirements. The

result is that while the user-level focus remains on the Act's *goals*, there is greater emphasis on

the Plain Writing Act's *requirements* at the institutional level. Users are concerned with whether

and how plain writing helps them to understand official documents such that they can respond

appropriately to meet their needs and comply with the government's requirements. For agencies,

however, compliance with the Act is evidenced by how many documents adhere to plain writing

guidelines, how many employees are trained in plain language principles, and how agencies

ensure that employees are applying the plain writing "standard." While users may ultimately

benefit from these implementations of the Act's requirements, the reports generally do not

address what compliance means for users. Rather, they articulate what compliance with the Act

means for USG agencies and federal writers.

6.5.   Study Findings: The Implications for USG Plain Language Policy

These various formulations of real plain bureaucratic writing, what it does, how it does it,

and for whom, create a conundrum for USG plain language policy. On the one hand, users

benefit from and value plain writing, which generally improves understandability and may also

facilitate accessibility and usability. There are many studies that support this claim, as does this

dissertation research. On the other hand, plain bureaucratic writing—when forwarded as standard

written English in the plain style—primarily responds to bad government writing. Given that

plain bureaucratic writing is understood differently across the various policy levels and,

therefore, does different things for different stakeholders, it is impossible to meaningfully

determine its effects. Moreover, without criteria for measuring accessible, usable, plain, clear,

etc., there is no way to benchmark the extent to which USG plain language policy does what it

sets out to accomplish, as articulated in the Plain Writing Act of 2010.

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6.5.1. The Subjectivity of Plain (Good, Clear, Etc.)

Plain language commentators agree that what is plain for one audience is not necessarily plain for another. The literature makes this point time and again, and the study findings show how conceptions of plain vary across, as well as within, policy levels and for various reasons. The communicative event is unique to all its participants; therefore, what is plain is subjective for both writer and reader as well as distinctive to the occasion. At the same time, change is part and parcel of a living language (See Baugh and Cable 18, for example). New communications technologies have driven rapid and broad shifts in various aspects of the English language (Crystal Loc. 1114), creating the conditions for language innovation (Blommaert Loc. 329). Just as language changes, so too do conceptions of what constitutes good or bad style in writing as well as correctness. For Michel Foucault, historically contingent "grids of intelligibility" frame what we can consider as truth (good, right, wrong, etc.) at any given moment (90). Thus, what clear, concise, and well-organized writing looks like changes over time based on a multiplicity of factors.

Consider the epigraph to this chapter, which is an excerpt from Hugh Blair's *Lectures on Rhetoric and Belles Lettres*. Blair makes an observation about clarity in 1787 that is similar to what PLAIN International says about it on its website: "Plain language (or clear writing) is a way of writing and presenting information so that readers can understand it quickly and easily" (*Plainlanguagenetwork.org*). However, the style and grammar are very different in the two statements. According to Blair, "[a]ll the qualities of good style may be ranged under two heads, perspicuity and ornament" (67). Nonetheless, by current standards, his version of clarity and good style are anything but. The language is highly formal, the sentence syntactically complex, and the punctuation inconsistent with contemporary practices. This comparison illustrates the

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effect of context on perceptions about language qualities and characteristics. In this case, time

and geographic location, among many other likely factors, not only influence what constitutes

plain but also the very terms associated with it (perspicuity versus clear). After all, it is not the

modern perspicuous language movement; it is the modern plain language movement.

The Center for Plain Language provides a good example of the subjective nature of plain

writing. Each year it gives ClearMark awards to those organizations whose documents best

represent the principles of plain writing. In 2014, the Consumer Financial Protection Bureau took

the grand prize for its loan estimate form. The Center explains the award, noting, "Anytime an

agency turns two long, head-scratching forms into one that's not only shorter, but more clear, we

rejoice" (*Centerforplainlanguage.org*-updated). The use of *more clear* instead of *clearer* is

jarring because words with one syllable typically take *–er* in the comparative form (Hixon 91).

The sentence is in plain language. The words are short and simple, and it is very easy to read and

understand. It may be a good example of plain writing; however, to my mind, it is also what WI-

1 might call "grammatically sloppy" writing. In the user plain language policy paradigm, this

example could be considered plain writing; it is understandable. In the institutional-writer

paradigm, it could be either plain bureaucratic writing (it has the characteristics) or bad writing

(it does not conform to EAE).

The point of this discussion is to highlight that what constitutes good or bad writing, effective

or ineffective writing, or plain writing—and for whom—is both subjective *and* context

dependent. And it is largely a matter of taste, which, as the oft-quoted maven of good writing

William Zinsser puts it, "is a quality so intangible that it can't even be defined. But we know it

when we see it" (233). Plain writing, like good or bad writing, is in the eyes of its beholder, even

in the bureaucratic context. The examples above and throughout this dissertation illustrate how

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conceptions of plain change across time and space. Furthermore, even plain writing can be bad

writing, depending on how bad writing is defined (e.g., grammatically non-standard). Put another

way, the fact that writing can be easily accessed, read, understood, and used does not guarantee

that it is good writing, plain writing, or both. Bad writing, like good writing, can be effective if it

does what the writer intends for it to do—it just might not adhere to the principles of standard

written English.

6.5.2. Meaningful Assessment Requires Stable Definitions

As is the case with writing qualities such as plain, good, and clear, the 2013 compliance

reports, writer participants, and user participants have various, sometimes competing, definitions

of the Plain Writing Act's objectives. Accessibility, in particular, has very divergent meanings

among study participants. Some link it to specific language practices or features. For them,

language that is clear, simple, and free of jargon and legalese is easier for users to connect with

and understand. In this sense, plain language facilitates readers' access to meaning. Others,

however, suggest that accessibility in the plain language framework refers to information

availability. This type of accessibility implies that government information is more available

through the application of plain language principles. Thus, the reader is able to find needed

information within a document, on a website, or in some other suitable format. Accessibility in

this sense is the "locatability" of documents or information. Some study participants reference

accessibility but do not define it or even imply what they mean by it. Others indicate that there is

no relationship between plain writing and accessibility.

There are relatively few references to usability across the dataset, so it is unclear how

participants understand it, particularly given that neither the Act nor the Office of Management

and Budget's implementing guidance define it. Most study participants reference

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understandability as we would expect. It is the reader's ability to comprehend "the intended

message and meaning . . . the writer's purpose, main point, and argument or . . . the writer's

process or guidance that the reader should follow to achieve the reader's goal" (SR-5). However,

understandability and readability are often conflated. By explaining plain writing as "[w]riting

that your intended audience can understand in one reading," for example, SR-1 links readability

to comprehension. "In one reading" implies that a text should be, if not easy to read, at least not

so difficult that the intended audience must read it more than once to understand it.

   This lack of consistent definitions means that conversations about plain language and the

Plain Writing Act of 2010 can be at cross-purposes. Without stable, agreed-upon definitions and

criteria for determining what constitutes accessibility, understandability, and usability, it is

impossible to talk meaningfully about how they relate to plain (good, correct, etc.) language in

the bureaucratic context or with respect to the accomplishment of the Plain Writing Act's goals.

Moreover, it is difficult, if not impossible, to measure whether and how plain bureaucratic

writing affects user interactions with government documents when these terms are undefined or

mean different things to different stakeholders. Herein lies a fundamental problem with USG

plain language policy, particularly as it is appropriated at the institutional and writer levels. Plain

bureaucratic writing at these levels conflates the quality of language, which cannot be objectively

measured, with language characteristics, which can. The correct grammar, proper punctuation,

and appropriate usage that underpin conceptions of good, correct, and plain writing in the

bureaucratic context are measurable. The characteristics of the plain style can also be more easily

ascertained than accessibility, understandability, and usability, especially since these terms are

inconsistently defined. One need only count the instances of jargon or technical terms, for

example, determine whether there are more short sentences than long and complex sentences, or

consider the frequency of personal pronouns in a document to assess the extent to which the text is in the plain style. Grammar and punctuation "errors" can be quantified, and document design that is consistent with best plain language practices is visible. In contrast, accessibility, understandability, and usability not only mean different things to different stakeholders, but they are also affected by many factors besides plain language, some of which are non-linguistic.

The Plain Writing Act of 2010 requires a specific style of writing in all public-facing documents. However, what this plain writing is in the bureaucratic context, what it does, and how its impact is understood and measured vary across and within all the levels of policy, demonstrating that it is impracticable to legislate a particular approach to writing. If it is unclear what constitutes plain bureaucratic language beyond specific textual characteristics, the USG cannot effectively implement plain language policy as the Plain Writing Act of 2010 spells it out—at least not consistently or meaningfully. After all, how can agencies determine the efficacy of plain bureaucratic language given that conceptions of good, plain, clear, etc., are subjective and contingent, particularly across policy levels? Furthermore, agencies and federal writers cannot determine whether or how well their plain language texts achieve USG plain language policy objectives if there are no stable, clearly defined criteria for measuring plain language success. That is to say, we cannot measure what plain bureaucratic language accomplishes if we cannot agree on what constitutes the clear, concise, and well-organized writing the Act mandates, understand the Act's objectives differently, and do not have a reliable way to determine whether or how those objectives have been met.

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6.6. Usability: A Better Measure of Government Communications' Effectiveness

I have made the case throughout this dissertation that the reliance on language features as the primary measure for what plain writing is and does in the bureaucratic context does little to support or forward USG plain language policy objectives. Cutts gets to the crux of the problem with this approach, noting, "No writing can truly be regarded as clearer or better, however, until users' performance proves it" (Loc. 155). For Cutts, the ultimate test of plain (good, clear, etc.) writing is whether the reader can use the text in the way the writer intends. Similarly, Stephens, Debra Huron, and Angela Colter point out that what users do with a text determines how successful the writer has been in communicating her or his message (147). Rather than suggesting plain writing as usable writing by virtue of the fact that is has certain characteristics and qualities, these commentators convey usability as the measure of a document's understandability, *as that understandability is influenced by plain language techniques*. Put another way, a document's usability establishes the extent to which it is understandable and accessible given all the factors that impact the user's ability to access, read, understand, and use it, including plain language.

With its emphasis on plain language, the Plain Writing Act of 2010, it seems, has it somewhat backward. There is certainly plenty of evidence that underscores the value of plain language to government communication. However, as this study demonstrates, plain language is not an accurate measure of government-citizen interaction vis-à-vis official texts in the Plain Writing Act context, and in some iterations, it is not even a very good one. Users can find plain language texts difficult to access, read, understand, or use for many reasons. Moreover, plain language simply cannot address problems related to process, literacy, and personal experience or

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preference, among others. Simply put, plain bureaucratic writing is not a panacea for the

problems associated with traditional bureaucratic writing, that is, "bad" government writing.

Particularly as it is formulated at the institutional and writer levels, plain bureaucratic writing

tells us little about what plain language means for "clear government information the public can

understand and use" (PL 111-274 Sec. 2) beyond the frequency of plain writing characteristics in

government texts as they are grounded in EAE.

Usability, on the other hand, provides a meaningful way to gauge how various language

practices, including plain bureaucratic writing, affect a text and, importantly, to what end(s). To

use a text the way the writer intends, the user must be able to understand it. But for the user to

understand the document, he or she must first be able to read it, and readability presumes access.

Access might mean an inviting tone or the user's ability to find a document or information within

it, but he or she must be able to obtain the text in order to read it. For its part, readability might

mean the ability to see the words on a page or the ease with which one can read a text. But in

order to understand the information a document is designed to convey, the user first has to read

it. And if the user cannot understand the text, it is unlikely that he or she will be able to use it as

needed and intended, except by chance or with assistance.

There are numerous factors that influence government-citizen interaction through official

texts, and, ultimately, they all affect a document's usability. We know that plain language has a

significant and positive effect on accessibility—depending on how it is defined—readability, and

understandability. Plain language can also facilitate usability. However, there are many other

factors, linguistic and non-linguistic, that influence these components as well, both positively

and negatively. Technology, for example, enhances access to information and documents for

those with computers and smartphones. On the other hand, it can also interfere with accessibility

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when agencies presume that citizens can easily access web-based texts. Plain language is not a

factor in these examples; however, technology's impact on access ultimately affects usability.

Again, to use a document, it first has to be accessed, read, and understood. Thus, usability, not

plain language, is a better indicator of the overall effectiveness of USG communications; what

the user does with or as a result of a text is the ultimate measure of the government's ability to

influence the citizen-government interaction toward a desired end.

6.7.   USG Plain Language Policy Moving Forward

It is important to remember that the focus of this analysis is on plain bureaucratic writing,

plain language in the bureaucratic context. It is not about literary or academic writing, for

example, which, like bureaucratic writing, have their own conventions. The conventions of

government writing, whether for good or bad, are grounded in the EAE tradition, and EAE is

likely to be the standard for government writing for the foreseeable future. Given that the Plain

Writing Act of 2010 requires plain language in all public-facing documents, EAE will inevitably

continue to be part of the USG plain language policy paradigm as well—regardless of the form it

takes. This is not to say that the EAE standard is not useful. According to Crystal, "A

linguistically or dialectally diverse nation needs a standard language to permit mutual

intelligibility" (Loc. 323). However, as this study shows, the institutional-federal writer

appropriation of plain language as standard written English in the plain style prioritizes the form

of plain bureaucratic language over its function, thereby masking the fact that it is but one of

many variables in the textual government-citizen interaction. As a result, plain language policy

implementations at these levels fail to leverage the demonstrable value of plain writing in

government documents, at the same time, accentuating the limitations—indeed, the

impracticality—of legislating a specific style of writing.

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The challenge in moving forward, then, is to preserve the value of plain language while, at the same time, acknowledging the reality of the plain bureaucratic writing context to which EAE is central. By reorienting the focus of USG plain language policy efforts to usability, [subjective] notions of bureaucratic writing (good, bad, plain, etc.,) become less important than what bureaucratic writing actually does, and for whom. Whether or not we agree with the ways USG plain language policy is forwarded by its various stakeholders, the fact that plain bureaucratic writing is mandated, or that it even *should* be legislated, plain language is, nonetheless, the law, and there is other plain language legislation in the works. Hence, it behooves us, as citizens and writing studies scholars, to carefully consider what USG plain language policy is, what it does, and what means for the textual government-citizen interaction.

There is much more to the plain language the Plain Writing Act of 2010 forwards than simply clear, concise, and well-organized writing that we can neither define nor measure. User participants, writer participants, and the 2013 compliance reports all provide useful insights about what plain bureaucratic language means and does at the various levels of language policy. And while much plain language research to date has focused on how to reduce costs and increase benefits for the information producer (See Kimble, *Writing for Dollars*, for example), this study shows that both the costs and the benefits of plain language extend far beyond time and money— both for producers and users of government documents. Nonetheless, it remains to be seen whether and how well this law will endure. It is my hope that this research contributes to understandings of plain bureaucratic language, provides useful insights about how to preserve the value of plain bureaucratic writing for producers and users of USG documents, and highlights potential avenues for further inquiry. After all, as W-1 puts it, "How can anyone be against stuff being clearly written?" To that end, the USG needs to leverage the requirements of

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the Plain Writing Act of 2010 in ways that enhance the *usability* of government information,

remembering that there is much more to "stuff being clearly written" than just standard written

English in the plain style.

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[1] The Plain Writing Act passed in the House of Representatives by a vote of 386-33; the bill passed by unanimous consent in the Senate (*Thomas.loc.org*).

[2] The Act defines *agency* in accordance with 5 USC § 105: "'Executive agency' means an Executive department, a Government corporation, and an independent establishment."

[3] The Center for Plain Language updated its website in April 2014. Unless otherwise noted, references to the website are for the pre-April 2014 version.

[4] In *Language Management*, Spolsky argues there are three components to language policy: language practices, beliefs, and management. Practices are the observable ways people relate to language—what they do and the choices they make. Beliefs are the values associated with language, the underlying ideologies that drive practices. The

"observable" efforts to somehow alter beliefs and practices, says Spolsky, constitute language management (Loc.119).

[5] Cassels Johnson differentiates between language policy agents and arbiters. Both are "responsible for creation, interpretation, and instantiation of language policy"; however, the latter have proportionately more power in a particular language policy layer than do other agents (Loc. 4766-4770).

[6] The focus group flyer I provided to Organization A is the version I revised to a 7th-grade level on the Flesch-Kincaid scale at the request of the IRB. However, Organization B requested that I further simplify the language in the flyer to make it more accessible to its community in order to increase the chances of engaging users for participation in the study. I revised the flyer to a 5th-grade level on the Flesch-Kincaid scale.

[7] Sources for the examples are as follows: A/B (*Centerforplainlanguage.org*); C/D, E/F, G/H, I/J, K/L (*Plainlanguage.gov*)

[8] In a December 8, 2009, memorandum, the Office of Management and Budget directs agencies to "take specific actions to implement the principles of transparency, participation, and collaboration" that "form the cornerstone of an open government" (1). A number of agencies link their Plain Writing Act compliance efforts to their Open Government initiatives.

[9] I only coded for plain language, plain English, and plain writing when these terms are used to describe a type of writing or an approach to language. I did not code, for example, references to the Plain Writing Act or its requirements (e.g., the need to conduct plain language training). Similarly, I did not code for these terms when used as headings in the compliance reports.

[10] The remaining 4% or respondents did not answer the question.

[11] Some respondents indicate that they are not sure (8%) whether they are familiar with the Act or its requirements, or they did not answer the question (4%).

[12] PL 104-13, the Paperwork Reduction Act (PRA) of 1995, is designed to limit the burden of federal paperwork on the public (Introduction). The PRA requires agencies to evaluate the need for and test all data collection instruments aimed at the public. Thus, it can be quite burdensome and time consuming for federal writers to test out documents on the public that uses them.

[13] In July 2012 and again in November 2013, the Center for Plain Language issued "Report Cards" for federal agencies, grading them on how well they fulfilled the mandates of the Act (setting up a website, designating a senior official, educating employees on plain language, providing a feedback mechanism for the public, etc.) as well as the degree to which they comply with the spirit of the law. Agencies were given letter grades, which ranged from A to F, for their performance. Link: *http://centerforplainlanguage.org/resources/plain-writing-laws/plain-language-report-card/*

[14] If I was unable to locate the plain writing section or link from the homepage of the agency's website, I searched website the using the terms *plain language* and *plain writing*. If the search yielded no results, I determined that the agency does not have a plain writing section or webpage that is easy to find.

[15] I coded only the text introducing each section of the report (approximately 20 pages), not the tables.

[16] To protect WI-4's anonymity, I do not name her agency.

[17] Two user participants did not answer this question.

[18] Two user participants did not provide responses.

[19] According to the National Center for Education statistics, the people in this category tested *Below Basic* in prose or could not be tested because of language barriers (National Assessment of Adult Literacy N. pag.).

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