

CONGRESSIONAL REPORT • April 2015

Plain Writing Act Compliance 2014–2015 National Credit Union Administration

NCUA is the independent federal agency created by the U.S. Congress to regulate, charter, and supervise federal credit unions. With the backing of the full faith and credit of the United States, NCUA operates and manages the National Credit Union Share Insurance Fund, insuring the deposits of more than 99 million account holders in all federal credit unions and the overwhelming majority of state-chartered credit unions.

At MyCreditUnion.gov and Pocket Cents, NCUA also educates the public on consumer protection and financial literacy issues.



# Plain Writing Act Compliance Report 2014–2015

#### Introduction

The <u>Plain Writing Act of 2010</u> became law on October 13, 2010. This law requires public communications by federal agencies, including the National Credit Union Administration, to be clear and understandable.

NCUA's mission is to promote confidence in the national system of cooperative credit. Part of the fulfillment of that mission is providing "communication that the public can understand and use" as set forth in the Plain Writing Act.

NCUA's Board, senior leadership, managers, and staff are fully committed to compliance with the Plain Writing Act. We are pleased to provide this annual report for the 2014–2015 compliance period.

## **Initial Requirements and Achievements**

The Plain Writing Act mandates six core actions and four additional requirements agencies must fulfill to comply with the law:

#### Core Actions

- Designate one or more senior officials within the agency to oversee the agency's implementation of the Plain Writing Act.
- Communicate the requirements of the Plain Writing Act to the employees of the agency.
- Train employees of the agency in plain writing.
- Establish a process for overseeing ongoing compliance of the agency with the requirements of the Plain Writing Act.
- Create and maintain a plain writing section of the agency's website that is accessible from the homepage of the agency's website.
- Designate one or more points-of-contact to receive and respond to public input on agency implementation of the Plain Writing Act and the reports required by the law.

## Additional Requirements

- The plain writing website for the agency must inform the public of the agency's compliance with the requirements of the Plain Writing Act. The website must also provide a mechanism for the agency to receive and respond to public input on the agency's implementation of the Plain Writing Act and required reports.
- Beginning not later than one year after the date of the enactment of the Plain Writing Act, each agency shall use plain writing in every covered document of the agency that the agency issues or substantially revises.
- Not later than nine months after the date of the enactment of the Plain Writing Act, the head of each agency must publish on the plain writing section of the agency's website a report that describes the agency's plan for compliance with the requirements of the law.
- Not later than 18 months after the date of enactment of the Plain Writing Act, and annually thereafter, the head of each agency shall publish on the plain writing section of the agency's website a report on agency compliance with the requirements of the law.

In previous annual reports about the Plain Writing Act, NCUA has outlined how it complies with each of these core actions and additional requirements. As detailed below, NCUA continues to follow these standards.

#### **Plain Writing Officer and Infrastructure**

During the 2014–2015 reporting year, NCUA selected a new senior agency official to oversee implementation of the requirements of the Plain Writing Act. The Director of the Office of Public and Congressional Affairs now serves as the agency's Plain Writing Officer. NCUA's Plain Writing Officer also serves as the agency's point-of-contact to receive and respond to public input. Additionally, staff in the Office of Public and Congressional Affairs support the work of the Plain Writing Officer by reviewing draft covered documents and providing guidance within the agency on complying with the law.

NCUA continued to invite public input on the agency's plain writing efforts during the year. Questions or comments about the agency's efforts to promote plain writing may be sent by email to <a href="mailto:plainwriting@ncua.gov">plainwriting@ncua.gov</a>. NCUA also continued to maintain a <a href="mailto:plainwritingwebpage">plainwriting@ncua.gov</a>. NCUA also continued to maintain a <a href="mailto:plainwritingwebpage">plainwritingwebpage</a> that meets the law's requirements for providing access to agency implementation and compliance reports and providing a mechanism for public comment.



Finally, NCUA continued to educate its workforce about plain writing requirements and to produce documents that are easy for public audiences to understand and use. Highlights of those efforts during the current reporting period are listed below.

## **Staff Training**

- In December 2014, the Plain Writing Officer released an updated and expanded version of the *NCUA Communications Manual*. The 270-page manual is a staff reference guide for developing internal and external communications. The manual includes comprehensive chapters on plain writing and English usage, as well as chapters on letters, press releases, publications and newsletters, slide shows, and web postings, among others.
- NCUA executives and managers routinely incorporated discussions of plain writing principles in staff meetings. For example, during weekly staff meetings of the Office of Public and Congressional Affairs, staff spent time reviewing plain writing and English usage.
- The Office of Human Resources provided field staff with a two-day writing course and a writing class for office staff, both of which emphasize plain writing. In 2014, 30 employees attended these courses. The Office of Human Resources also arranged writing classes to meet specific needs of individual offices or individual employees.
- New NCUA examiners attended a one-day plain writing course as part of their initial training.
- The Office of Small Credit Union Initiatives staff completed 1.25 hours of interactive training on the revised *NCUA Communications Manual*, with an emphasis on plain writing, and six hours of training specifically focused on understanding and complying with the law in all office communications.
- The Office of Consumer Protection provided its staff with plain writing training and hosted a session with the Office of Public and Congressional Affairs that included a review of plain writing principles and English usage.
- NCUA included a Plain Writing Act refresher training course during the agency's new computer rollout.
- In addition to the plain writing and English usage sections of the *NCUA Communications Manual*, the agency offered staff access to other plain writing resources, including training through the <a href="PlainLanguage.gov">PlainLanguage.gov</a> website, the agency's internal online Learn Center, and a plain writing tip sheet available on the agency's internal SharePoint site.

- During the first four months of April 2015, the Office of Public and Congressional Affairs hosted an agency-wide employee webinar and provided in-person training to selected offices on the updated NCUA Communications Manual. Both the webinar and training sessions discussed plain writing principles and requirements. More than 300 employees participated in the webinar and the training sessions. The webinar is now archived for viewing by those individuals unable to participate in the sessions.
- Consistent with the agency's annual performance plans, the Office of Public and Congressional Affairs posted plain writing and other communications tips in nearly every issue of the agency's weekly internal e-newsletter for employees.
- NCUA regional office quarterly newsletters for employees also included discussions of plain writing. For example, NCUA's Region I office published an article in its *First Impressions* Winter 2015 newsletter about the use of abbreviations and nicknames in plain writing.

#### **Communications Products**

- NCUA is in the midst of a redesign of the agency's website. In coordination with the Office of Public and Congressional Affairs, the Office of the Chief Information Officer is working with each office within NCUA to ensure that plain writing principles are used in the development of new web pages and the revision of existing content.
  - The <u>NCUA.gov</u> website is the agency's primary communications vehicle for sharing information with the public. In all, the website posted more than 2.7 million user sessions in 2014.
  - The redesign project will result in a more mobile-friendly website and allow users to more easily find and understand information issued by the agency.
- The Office of the Chief Information Officer worked with the Office of Consumer Protection to develop easy-to-read design features for the agency's consumer information website, <u>MyCreditUnion.gov</u>. The website is available in English and Spanish.
  - During 2014, 564,970 users came to <u>MyCreditUnion.gov</u> for information about credit unions and personal finance tips.
- The Office of the Chief Information Officer developed mobile templates for <u>MyCreditUnion.gov</u> to support NCUA's growing mobile audience. These templates enable users to find what they need and read it more easily.



- In all, 40.3 percent of the sessions on <u>MyCreditUnion.gov</u> during 2014 came from mobile devices.
- The Office of Public and Congressional Affairs continued to produce a monthly newsletter for credit unions following the principles of plain writing.
  - The NCUA Report is the agency's flagship publication, with approximately 9,000 print subscribers and nearly 260,000 online page views during 2014. The newsletter includes columns from NCUA Board members, articles on the agency's initiatives, and information about supervisory, regulatory, and compliance issues that are important to all federally insured credit unions.
- The Office of Consumer Protection used plain writing principles to develop scripts and visual content for videos and webinars, and in revisions of scripts provided to staff in the agency's Consumer Assistance Center.
- The Office of Consumer Protection applied plain writing principles to develop training materials for staff and in correspondence with federal credit unions on compliance with various federal laws.
- The Office of the Chief Financial Officer updated Request for Quote and Request for Proposal templates to incorporate plain writing principles and provide vendors with greater clarity.
- The Asset Management and Assistance Center updated its Liquidation Brochure, which is sent to members of liquidated credit unions, and its correspondence templates to make them easier to read.
- The Office of General Counsel followed the principles of plain writing in reviewing and drafting regulations, including when writing the widely read preamble for NCUA's revised proposed risk-based capital rule.
- The Office of Minority and Women Inclusion worked closely with the Office of Public and Congressional Affairs to incorporate plain writing principles in the preparation of three reports to Congress: the Annual Report on NCUA Efforts to Preserve Minority Depository Institutions, the Office of Minority and Women Inclusion Annual Report, and the No FEAR Act Report.

## **New Processes and Ongoing Compliance**

• Throughout the reporting year, the Plain Writing Officer periodically reminded offices about the need to comply with the Plain Writing Act.

- NCUA executives and managers reviewed documents for compliance with plain writing principles and the requirements of the NCUA Communications Manual, provided feedback to employees, and assessed plain writing compliance as part of annual appraisals.
- The Office of Examination and Insurance has two technical writers and editors on staff. These experts are directly involved in the preparation of covered documents to help ensure consistency in the use of plain writing.
- NCUA reviewed and updated templates used for public communications to meet the requirements of the NCUA Communications Manual and the principles of plain writing. The Office of the Chief Information Officer reports improved uniformity and efficiency in communications as a result of using plain writingbased, agency-approved correspondence templates.
- NCUA's Office of the Chief Economist has incorporated a multi-staff review process for accuracy and clarity of all written work products. Product and presentation feedback emphasizes effectively communicating to the target audience.
- The Office of Inspector General directs all its staff that writing standards set forth in the Plain Writing Act apply to the office's written work products.
- Following the requirements established in the revised *NCUA Communications Manual*, the Office of Public and Congressional Affairs reviewed all reports, newsletters, and public documents for compliance with plain writing requirements.

NCUA posted this report on April 30, 2015. This is the fourth annual review of NCUA's compliance with the Plain Writing Act.