

CONGRESSIONAL REPORT • April 2016

Plain Writing Act Compliance 2015–2016 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 102 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 2015–2016

### Introduction

President Barack Obama signed the <u>Plain Writing Act of 2010</u> into law on October 13, 2010. This law requires public communications by federal agencies to follow clear and concise "plain writing" principles.

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.

Compliance with the requirements of the Plain Writing Act is a priority for NCUA senior leadership, managers, and staff. Accordingly, the agency works continuously to improve its performance.

We are pleased to provide this report for the 2015–2016 compliance period. NCUA posted this report on its website on April 29, 2016. This is the fifth annual review of NCUA's compliance with the Plain Writing Act.

# **Initial Requirements**

The Plain Writing Act mandates six core actions and four additional requirements agencies must fulfill to maintain compliance 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 the agency's 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 shall 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.

# **NCUA Plain Writing Officer and Infrastructure**

NCUA has designated the Director of the Office of Public and Congressional Affairs as the senior official responsible for implementing the Plain Writing Act. This Plain Writing Officer also serves as the agency point-of-contact to receive and respond to public input. You may send an email to <a href="mailto:plainwriting@ncua.gov">plainwriting@ncua.gov</a> with questions or comments about the agency's efforts to promote plain writing.

NCUA also maintains a <u>plain writing webpage</u> that meets the law's requirements for accessibility to agency implementation and compliance reports and providing a mechanism for public comment.

Throughout the reporting year, NCUA engaged in numerous activities related to plain writing. For example, the Plain Writing Officer periodically reminded offices and agency leaders about the need to comply with the Plain Writing Act. The agency also worked to review and improve its public communications. Additionally, NCUA



regularly educated staff about plain writing. Each of these efforts was aimed at producing public documents that are easier for public audiences to understand and use.

Examples of NCUA's efforts to improve plain writing, provide staff training, and enhance communications products follow.

## **Review and Improvement of Agency Communications**

NCUA regularly reviews its print communications in an effort to improve the clarity and readability of these documents. During 2015–2016, our activities included:

- In November, the NCUA Board approved the agency's <u>2016–2017 Annual</u> <u>Performance Plan</u>. Among other things, this plan requires the completion by the end of 2016 of Plain Writing Act-compliance reviews of the 50 most viewed pages on <u>NCUA.gov</u>.
  - To achieve this performance goal, the Office of Public and Congressional Affairs issued a request for proposal for an outside consultant experienced in plain writing and compliance with the law to review and make recommendations for improvement to three key agency communications vehicles: the agency's regulatory website, press releases and *The NCUA Report*, which is the agency's monthly newsletter. NCUA expects to hire the consultant by June 30, 2016.
- Issued and maintained by the Office of Public and Congressional Affairs, the *NCUA Communications Manual* continued to provide guidance to NCUA staff on plain writing and other subjects. Chapter 2 covers plain writing and is the longest single section of the manual.
  - The Office of Public and Congressional Affairs began efforts this year to update the manual and will issue a revised version to staff before the end of 2016. In making these revisions, the office is working to provide more NCUA-specific examples in the chapter on plain writing. These examples will assist staff in creating better written products for the public on NCUA subject matter.
- NCUA staff used templates created by the agency for memorandums, reports and correspondence. These templates incorporate plain writing principles and help ensure consistency in agency communications.
- In addition to the regular plain writing reviews of external communications conducted by the Office of Public and Congressional Affairs, two technical assistance writers in the Office of Examination and Insurance serve as gatekeepers for all outgoing written communications, including ensuring the use of plain writing.

• In April, the Office of Minority and Women Inclusion also hired a diversity communications specialist. This employee will work to improve communications about diversity and inclusion for both internal and external audiences, including working to ensure the agency produces documents that are more easily understood.

## **Staff Training**

During the reporting year, NCUA continued to train staff on plain writing. In addition to formal training, NCUA's offices regularly reviewed documents for compliance with those principles, provided feedback to employees and included adherence to plain writing as part of annual staff appraisals. Some of the general plain writing training efforts included:

- The agency continued to provide staff with access to several plain writing guidelines and resources, including training through the <u>PlainLanguage.gov</u> website and the agency's internal online Learn Center.
- The Office of Public and Congressional Affairs posted weekly plain writing tips in the agency's internal employee newsletter and hosted an agency-wide grammar quiz on National Grammar Day in March.

NCUA offices also provided training in plain writing to their staffs in workshops and routinely incorporated discussions of plain writing principles in meetings. Office-specific training efforts during the 2015–2016 reporting period included:

- The Office of Human Resources held seven one-day plain writing classes for field staff as part of the agency's standard training for new examiners. All 86 new examiners attended this training.
- Similarly, the Office of Human Resources held two two-day refresher plain writing classes. In all, 32 examiners attended these sessions.
- The Office of Human Resources also hosted writing classes for administrative staff and staff in the offices of General Counsel, Consumer Protection, and Small Credit Union Initiatives. A total of 96 staffers attended these classes.
- The Office of the Inspector General held a two-day plain writing workshop, run by an outside consultant, to provide training to its staff on plain writing, particularly with respect to the office's reports, correspondence, and email.
- The Division of Consumer Affairs in the Office of Consumer Protection conducted staff trainings on plain writing throughout the year, including one-onone and group sessions.



- NCUA's Region II office held a day-long writing class that included plain writing elements.
- Six members of NCUA's Region IV office attended writing courses that included plain writing instruction.
- NCUA's Asset Management and Assistance Center provided a writing course that included plain writing principles. In all, 23 staff attended the class.
- In addition to the training hosted by the Office of Human Resources, NCUA's Office of Small Credit Union Initiatives incorporated a discussion of plain writing principles into a staff meeting, which included a presentation by a plain writing consultant.
- The agency's Region I, III and V offices incorporated plain writing review and coaching during regular staff meetings during the year.
- The Office of Public and Congressional Affairs regularly incorporated discussions about plain writing and effective communications techniques during weekly staff meetings. These discussions often focused on frequently identified problems in plain writing. They also ensured greater consistency in the agency's strategic communications and messaging.

NCUA remains fully committed to improving plain writing. As part of the Board-approved 2016 budget, the Office of Public and Congressional Affairs obtained funding for creating a new staff training video on plain writing. The office is now developing this video and will finalize it before the end of 2016. Once available, NCUA staff will be required to watch the training video and pass a quiz on plain writing.

#### **Communications Products**

NCUA strives to produce public documents that are easy to understand. During the last year, some of the agency's efforts to improve plain writing included:

NCUA completed a redesign of the agency's regulatory website, NCUA.gov. The offices of Public and Congressional Affairs and the Chief Information Officer worked with each agency office to incorporate plain writing principles when developing new web pages. The project included redesigning the landing pages for all NCUA offices, a new information infrastructure, and content overhaul of more than 20 individual pages.

<u>NCUA.gov</u> is the agency's main communications tool for sharing information with the public, including media and credit union system stakeholders. The website received more than 2.6 million page views from stakeholders in 2015.

- The Office of Consumer Protection worked with the offices of Public and Congressional Affairs and the Chief Information Officer to update the agency's consumer information website, <u>MyCreditUnion.gov</u>, which included review for adherence to plain writing principles.
  - A total of 742,613 users visited the English and Spanish versions of MyCreditUnion.gov during 2015 to obtain information about credit unions, managing finances, insurance coverage, and protecting against frauds and scams.
- The Office of the Chief Financial Officer employed plain writing principles to improve the readability of the <u>2016–2017 Annual Performance Plan</u> and the <u>2017–2021 Draft Strategic Plan</u>. The office also applied plain writing principles to author a *Federal Register* document explaining the methodology for calculating the overhead transfer fee, thereby allowing the public to better understand this complex process.
- The offices of Public and Congressional Affairs and the Chief Financial Officer applied the principles of plain writing when drafting the agency's <u>2015 Annual</u> Report. These efforts improved the readability of the document.
- The Office of the Chief Information Officer designed and developed layouts for the agency's Fraud Prevention Center and Consumer Assistance Center to help improve response to consumer questions and complaints.
- The Office of Public and Congressional Affairs continued to produce the agency's flagship print product, <u>The NCUA Report</u> newsletter, which is written using plain writing principles. The newsletter includes columns from NCUA Board members and articles on agency initiatives and a variety of regulatory and supervisory subjects. It had approximately 9,000 print subscribers and drew 224,873 online page views in 2015.
- The Office of Public and Congressional Affairs worked with the offices of Consumer Protection, Small Credit Union Initiatives and the Chief Economist to produce videos with scripts that incorporated plain writing.
- The Office of Small Credit Union Initiatives produced a monthly online newsletter, <u>FOCUS</u>, which the Office of Public and Congressional Affairs reviewed for plain writing compliance before distribution.
- Staff of the Office of Public and Congressional Affairs served as reviewer and editor of various agency reports, including reports from the offices of Minority and Women Inclusion and Small Credit Union Initiatives, to ensure adherence to plain writing requirements.