

Plain Writing Act Compliance Report 2017–2018

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Introduction

The <u>Plain Writing Act of 2010</u> requires public communications by federal agencies to follow clear and concise "plain writing" principles. The NCUA's mission is to promote confidence in the national system of cooperative credit, and part of the fulfillment of that mission is providing "communication that the public can understand and use," as set forth in the Act.

Compliance with the requirements of the Act is a priority for NCUA leadership, managers and staff, and the agency works continuously to improve its performance. We are pleased to provide this report for the 2017–2018 compliance period, completing the seventh annual review of the NCUA's compliance with the Act.

Initial Requirements

The Act mandates six core actions and four additional requirements agencies must fulfill in order 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 Act.
- Communicate the requirements of the 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 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 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 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 Act and required reports.

- Each agency shall use plain writing in every covered document of the agency that the agency issues or substantially revises.
- 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.
- The head of each agency shall publish on the plain writing section of the agency's website an annual report on agency compliance with the requirements of the law.

Plain Writing Officer and Infrastructure

The NCUA's Director of the Office of Public and Congressional Affairs is the senior official designated to be responsible for implementing the Act and to serve as agency point-of-contact to receive and respond to public input. Questions or comments concerning the agency's efforts to promote plain writing may be sent by email to plainwriting@ncua.gov.

The NCUA continually educates staff about plain writing requirements and produces public documents that are easier for public audiences to understand and use. Examples of those efforts are listed below.

NCUA maintains a <u>plain writing webpage</u> that meets the Act's requirements for accessibility to agency implementation and compliance reports. The webpage also provides an email address for members of the public to send comments.

Resources

- Chapter 2 of the agency's *Communications Manual*, the most detailed chapter in the manual, provides staff with guidance on following plain writing principles.
- New NCUA examiners attend a one-day plain writing course as part of their STEP 7 training (communications), and new non-examiner employees are assigned a Plain Writing Act course as part of their orientation curriculum when they join the agency.
- The agency's Office of Human Resources provides a two-day Writing for Examiners course as well as Writing for Office Staff and Writing for Supervisors



courses. The office also arranges, on-request, writing classes tailored to meeting the particular needs of agency departments.

- The agency hosts a Principles of Plain Writing slide show on its internal NCUA Central website, providing helpful suggestions for writing clearly.
- NCUA offices continued to make use of templates created by the agency for memorandums, reports, and correspondence that incorporate plain writing principles and help ensure consistency and clarity in agency communications.

Plain Writing Compliance

- During the compliance period, the Office of Public and Congressional Affairs continued its work with Kleimann Communication Group, a consulting firm retained through the agency's standard contract bidding process in 2015, to review various agency written products. In 2017, Kleimann reviewed the agency newsletter, *The NCUA Report*, analyzing the newsletter for compliance with plain writing principles and offering suggestions that have been incorporated into the newsletter's production. During 2018, PACA will work with Kleimann on the final stage of its project, review of various agency reports.
- At the same time, PACA worked with the Office of the Chief Information Officer to incorporate Kleimann's analysis of the 100 most-viewed pages of the agency's website, *NCUA.gov*, and recommendations regarding the use of plain writing on the site. The improvements resulting from Kleimann's recommendations will be carried over to the 2018 website re-design.
- The NCUA continuously reviews its print communications to improve clarity and readability. Examples during 2017–2018:
 - The Office of Consumer Financial Protection incorporated plain writing principles in updating existing documents and creating new ones, including consumer brochures and infographics, scripts and visual content for videos and webinars, content for the consumer information website, MyCreditUnion.gov, informational materials for credit unions on Fair Lending compliance, and scripts and response letters for the Consumer Assistance Center.
 - The Office of Credit Union Resources and Expansion applied plain writing principles in developing credit union resource guides, training documents, the FOCUS electronic newsletter, and web content, including the new <u>Learning Management Service</u> training portal.



- The Office of the Chief Financial Officer employed plain writing principles to improve readability of the agency's <u>2017 Annual Report</u>, the <u>2018 Annual Performance Plan</u>, the <u>2018-2022 Strategic Plan</u>, and materials posted on the agency's <u>Budget and Supplementary Materials webpage</u> that explain the NCUA's budget, the annual operating fee and overhead transfer rate, the Share Insurance Fund equity ratio, and the planned distribution to eligible credit unions in the third quarter of 2018.
- PACA continued producing the agency's flagship print product, the <u>NCUA Report</u> newsletter, which is written in accordance with plain writing principles. The newsletter includes columns from NCUA Board members and articles on agency initiatives and a variety of regulatory and supervisory subjects. During 2017, newsletter switched from a monthly to a quarterly publication schedule and became an online-only document. The online version of the newsletter received 79,647 page views during 2017.
- PACA staff served as reviewers and editors of various agency reports—including the agency's 2017 Annual Report, the No Fear Act Report, the Office of Small Credit Union Initiatives' Community Development Revolving Loan Fund report to Congress, and the Office of Minority and Women Inclusion's 2017 Annual Report to Congress—to ensure adherence to plain writing requirements.

Training

NCUA offices provided plain writing training to their staff in workshops as well as routinely incorporating discussions of plain writing principles in meetings. In addition to scheduled training, NCUA offices regularly review documents for compliance with those principles, provide feedback to employees and include adherence to plain writing as part of annual staff appraisals.

Training during 2017–2018 included:

- Workshops and online training hosted by the NCUA's Office of Human Resources:
 - Two-day Writing for Examiners workshops, 45 attendees.
 - Two-day Writing for Office Staff workshops, 24 attendees.
 - Plain Writing Act online training, 25 attendees.
 - Plain Writing Act refresher online training, 7 attendees.
- The Office of Consumer Financial Protection again provided plain writing training to its entire staff at its 2017 annual meeting.



- Region III field supervisors provided training to staff regarding plain writing compliance and using the agency's *Communications Manual*.
- PACA and the Office of Human Resources in 2015–2016 produced and released a three-part online staff video training series highlighting the characteristics of plain writing, the importance of learning to write clearly, and providing exercises to help staff refine their skills to ensure their work is easily understood. The series, originally required training for all NCUA staff, continues to be available as a refresher course to staff through the NCUA's internal training portal, the LearnCenter. During 2017, seven NCUA staff members took the training as a refresher.