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Strengthening plain language: public benefit and professional practice

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Clarity … the journal

Published in May and November

Welcome from Clarity's editor in chief

I'm pleased to bring you this important issue of the *Clarity* journal. We are sending this issue not only to Clarity members, but also to members of PLAIN and the Center for Plain Language. These three organizations came together to form the International Plain Language Working Group. The group has worked for several years to bring you the options paper, *Strengthening plain language: public benefit and professional practice*, that forms this issue.

If you are not already a member of Clarity, we welcome you to learn more about our organization and to join—you need not be a lawyer to be interested in plain legal language and to join. You'll find information about joining on page 61. Meanwhile, I hope the options paper helps you to form your views on the future of our plain language world and that it encourages you to contribute to the discussion.

Julie Clement, editor in chief

This issue

Strengthening plain language: public benefit and professional practice

Neil James

Chair, International Plain Language Working Group

The journey towards this options paper began early one October morning at the 2007 PLAIN conference in Amsterdam. In the historic Beurs van Berlage building, three plain language organisations were putting forward position papers on some of the thorniest questions facing our field.

Should we establish international standards for plain language and how would that work? Can we certify plain language practitioners and create some kind of institute to do so? Is plain language still a movement focused on its public benefits, or should we drive it towards a profession?

The only thing resolved that day was the need to explore these questions further, and a vote from the floor heartily endorsed setting up a working group. The following year, PLAIN, Clarity and the Center for Plain Language nominated two members each to form what we prosaically called the International Plain Language Working Group. They were joined by a further six members from a wide range of countries and languages. Together, the group has represented the United States, the United Kingdom, New Zealand, Canada, Sweden, Portugal, South Africa, Mexico, Hong Kong, Belgium and Australia.

Early on, we realised that there would be no rapid consensus. So we set out to write an options paper exploring the most prominent questions relating to:

- defining plain language
- setting international standards
- training practitioners
- grounding plain language in research
- advocating for plain language
- certifying practitioners
- strengthening our institutional structure.

Two years later, *Strengthening plain language* is the result. It has been a long and challenging process. We debated the issues at conferences in Mexico, Sydney and Lisbon. We released a preliminary draft at the 2009 PLAIN conference and received some robust feedback that this version has taken into account.

No doubt, many will find much to disagree with. For others, the paper will not go far enough. Despite the time it has taken, we remain at the stage of identifying the questions to ask and the options to consider.

When it comes to standards and certification, for example, the working group has not yet endorsed any of the options we discuss. When considering training and research, we have identified such large gaps in our knowledge that our work will have to focus on filling them before we can do anything concrete. Fortunately, we have identified at least one major funding source that might help us along the way.

We have been a little more concrete in proffering a standard definition of plain language, but only after surveying a wide range of definitions and combining two approaches. No doubt the final wording will be the subject of considerable debate.

The question of advocacy is closely bound with that of the institutional structure. Do we attempt to set up an ambitious new international organisation or work with what we have? The options paper recommends a middle path that goes just one step beyond the existing informal cooperative action of the working group.

None of the questions we began with have changed much since the plenary in Amsterdam. But the options paper at least provides a more structured account to help us answer them in the most constructive way. We may only get one opportunity to do this, so it is better that we get it right rather than do it fast.

Underlying all of the chapters is the tension that was with us at the start: should our field remain a movement, become a profession, or achieve some other combination? Should we emphasise the public benefits of plain language or focus on professionalisation as the best means to do so? This remains a core question.

The options paper answers other questions much more clearly. At times, plain language has attracted criticism that it is too narrowly focused on expression, without enough emphasis on audience, structure, design or testing. The paper confirms that plain language practitioners will continue to bring a broad focus to improving public communications.

That focus is increasingly being recognised by governments around the world, such as with the passing of plain language laws in South Africa, and the Plain Writing Act in the United States. In some ways, the influence of plain language is growing more quickly than its institutional base. This paper can help us catch up.

Strengthening plain language will be essential reading for anyone affected by public communication, whether as a specialist language practitioner, a professional services provider, or an interested consumer of public language. We suggest you set aside some time to read it carefully, think about the questions it poses and contribute where you can. All feedback is welcome to Neil.James@plainenglishfoundation.com.

I know we will continue to receive a diversity of views passionately held. But as the poet William Blake once put it: 'without contraries, there is no progression'. It is only by working though our 'contraries' that we will emerge with a more concrete model. I am sure we will continue to see the kind of constructive and committed comments that people have contributed to date.

On that note, I would like to acknowledge some of the people and organisations that have got us this far.

Firstly, the individual members of the working group, who have drafted their chapters on top of already overfull workloads. The boards of the three member organisations have also given very generously of their time, along with space in their conferences for us to progress these issues. The Plain English Foundation has provided both the time of the chair and some administrative resources.

Secondly, thanks go to the many individuals outside the current working group who have contributed text and feedback: Mark Adler, Christopher Balmford, Sarah Carr, Martin Cutts, Robert Eagleson, Brian Hannington, Anne Marie Hasselrot, Joe Kimble, Laura Murto Linden, Bill Lutz, Joanne Locke, Sally McBeth, Eva Olovsson, Robert Phillips, Ginny Redish and Nad Rosenberg among others.

But I must reserve special thanks to Clarity, its members and subscribers. Getting this options paper to print has delayed publication of your journal twice in recent years, understandably raising concern. I hope you will forgive those of us involved given the nature and importance of the enterprise.

Our next steps include distributing this paper as widely as possible to garner feedback. The 2011 PLAIN conference in Stockholm then presents the opportunity to begin selecting a more concrete model for strengthening plain language and its public benefits.

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1. Defining plain language

Dr Annetta Cheek

Center for Plain Language, United States

Overview

The first task of the working group is to put forward a standard definition of plain language. We have looked at many definitions of plain language and plain English from around the world. We include guidelines for plain writing as implicit definitions.

Many definitions are similar to each other, and some of those are probably derivative, so we have restricted our selection to avoid tedious and pointless repetition. Additional samples are in section 1.5 Appendix—More definitions.

We have allocated each of the definitions to one or more of three categories. These options are similar to those identified in Neil James's paper at the 2008 Clarity conference in Mexico City ('Defining the profession: placing plain language in the field of communication', *Clarity* 61, May 2009). These are:

1. numerical or formula-based definitions
2. elements-focused definitions
3. outcomes-focused definitions.

These options represent 'ideal' definition types. In practice, most definitions combine characteristics of two or even all three types.

Recommendation

We recognise that all three types of definitions play a role in determining whether a particular communication is plain language, and all three help us achieve our goal of clear communication. However, for a basic definition, we recommend that we rely mainly on option 3. We propose:

> A communication is in 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.

1.1 Three categories of definitions

Option 1: numerical or formula-based

This approach defines plain language primarily through specific elements of readability. It flows from the earlier practitioners such as Rudolph Flesch and modern followers such as William DuBay. This approach counts elements such as word and sentence length, number of syllables, length of paragraphs, font size, and so on, or uses formulas applied mechanically to allocate documents points on a scale of plainness. They include the Flesch-Kincaid Index, the Coleman-Liau Index, and the Gunning Fog index. Many of these result in a measure of readability that purports to reflect the reading skill of people at a particular level of education.

Strengths of this approach

- Formulas are relatively easy to apply (often by computer program).
- They do not require judgement or writing expertise to administer.
- They offer an objective standard allowing anyone to decide as a matter of fact whether a document is readable.
- They can tell you if your document is difficult to read.

Weaknesses of this approach

- Formulas are overly simplistic, looking at only a few elements of language, especially sentence and word length.

- They don't tell you definitively if your document is easy to read.
- They can be misleading or even simply wrong.
- They provide no guidance on how to improve writing, beyond 'get a better score'.
- They recognise differences among reader groups only in gross ways, such as grade level.

Option 2: elements-focused

This approach is based on the techniques used to write clearly, which may be classified, for example, under:

- structure (for instance, arranging the information in a reader-friendly order, logically subdivided and well signposted, and constructing readable sentences and paragraphs)
- design (for instance, using typeface, typesize, white space, colour, and other methods to enhance readability)
- content (including helpful or entertaining information but omitting anything the reader doesn't need)
- vocabulary (choosing words which accurately reflect the writer's intention and which the intended audience will understand).

Strengths of this approach

- It is much broader than the formula-based definition.
- It is likely to more accurately reflect a text's readability.
- It provides guidance on how to improve writing.
- It can be tailored to different reader groups.

Weaknesses of this approach

- It is harder to use, and takes more time.
- It requires judgement and writing skill.
- It does not give a numerical measure of success.
- It can be difficult to achieve consensus on what specific techniques to consider, and which are the most important. This is especially true for techniques that have not been examined by formal research efforts.

Option 3: outcomes-focused

This approach, adopted by organisations such as the Center for Plain Language, focuses on how well readers are able to understand and use a document. The approach generally includes consideration of visual elements making documents easy to read, not just linguistic characteristics. Evaluating the usability of a document with some sort of testing is strongly recommended by proponents of this definition.

Strengths of this approach

- It is most likely to produce usable documents.
- It can give a statistical result of some sort, depending on the nature of the testing.
- It requires tailoring to differences among reader groups.
- Testing can give very specific guidance on how to improve a document.

Weaknesses of this approach

- It is the most difficult approach to use.
- Outcomes can be difficult, or at least time-consuming and expensive, to measure.
- Testing is often impractical.

1.2 Examples from each category

Option 1: numerical or formula-based

The Flesch reading ease test

There are two tests devised by Rudolf Flesch. The formula for the Flesch Reading Ease Score (FRES) test is

$$206.835 - 1.015\left(\frac{\text{total words}}{\text{total sentences}}\right) - 84.6\left(\frac{\text{total syllables}}{\text{total words}}\right)$$

Score	Notes
90.0–100.0	Easily understandable by an average 11-year-old student
60.0–70.0	Easily understandable by 13- to 15-year-old students
0.0–30.0	Best understood by college graduates

A score of 60 or higher would be considered plain language. Other scores are not labelled,

though a one-syllable sentence would score the maximum 121.

The test scores badly as plain mathematics, since the procedure is clearly not precise enough to justify three (or any) places of decimals. You get the same score (or at worst, rounded to the next whole number) if you multiply the average word length by 85, add the average word length, and deduct both from 207.

The other test developed by Flesch is the Flesch-Kincaid Grade Level test. It is also called the Flesch-Kincaid Readability test. The formula for this test is:

$$0.39\left(\frac{\text{total words}}{\text{total sentences}}\right)+11.8\left(\frac{\text{total syllables}}{\text{total words}}\right)-15.59$$

The Coleman-Liau index

The Coleman-Liau index uses a different calculation. Its output approximates the United States 'grade level' necessary to comprehend the text.

Unlike most of the other indices, Coleman-Liau relies on characters instead of syllables per word. Although opinion varies on its accuracy as compared to the syllable/word and complex word indices, characters are more readily and accurately counted by computer programs than syllables.

$$\text{score}=\left(\frac{\text{number of characters}}{\text{number of words}}\times 5.89\right)-\left(\frac{\text{number of sentences}}{\text{number of words}}\times 29.5\right)-15.8$$

The Gunning Fog index

Gunning, again relying on word- and sentence-length, suggests the 'grade level'—the number of years of education—needed to understand the text.

$$\text{grade level}=\left(\left(\frac{\#\text{ of words of more than 3 syllables}}{\#\text{ of words}}\times 100\right)+\frac{\#\text{ of words}}{\#\text{ of sentences}}\right)\times 0.4$$

Dale-Chall readability formula

The Dale-Chall readability formula computes a raw score, called the Reading Grade Score (RGS), which rates text on a United States grade-school level based on the average sentence length and the number of unfamiliar words, using the list of 3000 words commonly known by 4th grade students.

The formula for the Reading Grade Score is:

RGS = (0.1579 x DS) + (0.0496 x ASL) + 3.6365

RGS	Reading Grade Score
DS	Dale Score, or % of words not on Dale-Chall list of 3000 common words
ASL	average sentence length (the number of words divided by the number of sentences)

This formula is not the most popular, although some experts consider it the most accurate, since it's based on a list of specific words.

Option 2: elements-focused

J G McKay, a 19th-century Scottish sheriff ahead of his time, considered that:

> Good drafting says in the plainest language, with the simplest, fewest, and fittest words, precisely what it means.

Source: J G McKay, *Law Quarterly Review* 1887, p.326.

Richard Wydick characterises plain English as:

- economising with words
- avoiding archaic phrases, legalisms, and abstractions
- keeping subjects, verbs, and objects close together
- preferring simple verbs in active voice
- preferring one main thought in each sentence
- varying sentence length, but allowing no sentence to be too long.

Source: Richard Wydick, *Plain English for Lawyers*, Carolina Academic Press, 5th edn.

The HRSA guidelines add more detail (and we've excluded from this list criteria already mentioned):

Plain English:

- has a conversational style
- restricts the average sentence to about 15 words
- avoids hyphens and compound words
- gives examples to explain 'problem' words

- uses lower case rather than all capital letters
- assesses readability
- gives the context first, before giving the new information
- uses visuals that explain and clarify.

Source: Health Resources and Services Administration, USA, *Plain Language Principles and Thesaurus for Making HIPAA Privacy Notices More Readable*.

More detailed elements-focused definitions include the plain language standards used by organisations such as the Plain Language Commission (United Kingdom), Wordsmith Associates (Canada), the Plain English Foundation (Australia) or the Write Group (now Write Limited, in New Zealand).

For example, the standard set of questions used by the Plain Language Commission to test whether a document meets its Clear English Standard include:

Purpose

- Is the purpose obvious or stated early and clearly?

Content

- Is the information accurate, relevant and complete, anticipating readers' questions and answering them?
- Are essential technical terms explained or defined?
- Is a contact point stated for readers who want to know more?

Structure

- Is the information well organised and easy to navigate through, with appropriate headings and subheadings?
- Is there appropriate use of illustrations, diagrams and summary panels?

Style and grammar

- Is the style appropriate for the audience, with a good average sentence length (say 15 to 20 words), plenty of active-voice verbs, and reasonably short paragraphs?
- Is the document free of pomposity, verbosity and officialese (no aforesaids, notwithstandings, herebys, adumbrates, commencements and inter alias)?
- Is the text grammatically sound and well punctuated?
- Is capitalisation consistent in text and headings?
- If there is a contents page, are its headings consistent with those in the text?

Layout and design

- Does the document look good?
- Is the type easily readable and is there enough space between lines of type?
- Is there a clear hierarchy of headings and spaces?
- Have emphasis devices, such as bold type, been used well?

While lists such as these are not primarily used as definitions, they do serve to set out a more complete set of elements that plain language practitioners work with.

An even more detailed example of an elements-based definition is Joe Kimble's 1992 'Charter for Clear Writing', 9 COOLEY L REV 1 (1992), reprinted in three parts, 71 MICH B J 1064, 1190, 1302 (1992). The 2002 version is included in section 1.5 Appendix—More definitions.

Option 3: outcomes-focused

It is notable that two sources who provide detailed elements-based accounts of plain language also offer us higher-level outcome-based definitions.

Ginny Redish

This definition, based on one by Ginny Redish, is widely used:

> A communication is in plain language if the people who are the audience for that communication can quickly and easily:
>
> - find what they need
> - understand what they find
> - act appropriately on that understanding.

Ginny published the first two prongs of this definition in 1985, in a chapter called 'The Plain English Movement' in *The English Language Today*, edited by Sidney Greenbaum (Oxford: Pergamon Press). Since then, in numerous publications, she has added the third prong. This is the definition used by the Center for Plain Language.

Professor Joseph Kimble

In a resolution adopted in 1992 by the Legal Writing Institute, Joseph Kimble wrote:

> Plain language means language that is clear and readily understandable to the intended readers.

He expanded on this in 'Answering the Critics of Plain Language', *Scribes Journal of Legal Writing* (Vol 5 1994-95). Plain language is, he says:

> … the style of Abraham Lincoln, and Mark Twain, and Justice Holmes, and George Orwell, and Winston Churchill, and E. B. White. Plain words are eternally fresh and fit. More than that, they are capable of great power and dignity: 'And God said, Let there be light: and there was light. And God saw the light, that it was good'.

Martin Cutts

Martin Cutts defines plain English as:

> The 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.

Source: Martin Cutts, *Oxford Guide to Plain English*, OUP, 1996, pp. 3-4.

He adds that plain English is not an absolute but should be appropriate to the intended audience. Structure and layout should be used to help.

The U.S. Federal Government's Plain Language Network, in a definition derived from Ginny Redish, adds the concept of function:

> Plain language is writing so your readers can:
>
> • find what they need
>
> • understand what they read
>
> • use it to fulfill their needs.

Source: Federal Government Plain Language Network, USA, *Federal Plain Language Guidelines*, http://www.plainlanguage.gov/howto/guidelines/reader-friendly.cfm

Many more examples of outcomes-based definitions are in section 1.5 Appendix—More definitions.

Not a definition

> Make everything as simple as possible, but no simpler.

Source: Albert Einstein, widely quoted, but source not traced.

1.3 Our recommendation

The purpose of language is to communicate. The purpose of plain language is to communicate clearly and effectively. It places the needs of the audience over any other consideration. So it seems to us that our definition of plain language should be based primarily on option 3—does the document work?

Options 1 and 2 are needed to support an approach based primarily on option 3. The guidelines in option 2 give us advice on how to achieve better communication. The readability tests of option 1 give us a rough guide as to whether we've succeeded.

We intend our definition to apply regardless of language (not just to English) and regardless of the medium by which it is promulgated (so including electronic documents and speech, except that speech is not 'designed'), but the advice on how to achieve it will vary not only with language and medium but also with the needs of each audience.

Recommendation

We recommend the following definition of plain language:

> A communication is in 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.

Some flexibility is essential here and we don't think we can usefully be more precise in formulating a definition. What is reasonable will always depend on an infinite range of circumstances, including the nature and purpose of the document and the abilities of the various readers. Some clarification should be possible when standards are set.

One view is that if information is misleading it cannot be plain and that honesty is therefore an essential component of plain

language. This is a seductive idea, as a lie can be expressed in plain language: I didn't do it. And George Orwell argued for another, less obvious, incompatibility: 'The great enemy of clear language is insincerity. When there is a gap between one's real and one's declared aims, one turns as it were instinctively to long words and exhausted idioms, like a cuttlefish spurting out ink' (Politics and the English Language, 1946). So we believe we should define plain language without referring to honesty but that the need for honesty should be incorporated in the standards we set for plain language practitioners and documents.

1.4 Guidelines

As a starting-point for paper documents written in English for native English speakers who have graduated from high school, we offer the following guidelines because they are designed with our recommended definition in mind. They are no substitute for thought and should not be followed slavishly but as a means to the end of serving the audience's needs—departing from them when the end can be achieved as well or better by other means. It is particularly important that no institute or system of certification to which these discussions gives rise should become hidebound by form. As Phil Knight has said, 'Writing is art, and art is best when it is unbound.'

Structure

- Organise your points in chronological order, logical order, order of importance, or some other principle or combination of principles that is likely to make sense to the reader.
- Get to the main point as soon as possible, with subsidiary points afterwards.
- Ensure that each paragraph deals with one topic exclusively.
- Avoid paragraphs of more than about 150 to 250 words.
- Avoid sentences of more than about 40 words.
- Aim for an average sentence length of between about 15 and 22 words.
- Avoid consecutive long sentences, even if each is less than 40 words.
- Keep subject, verb, and object as close together as possible, and generally in that order.

Design

- Use fonts and font sizes that are easy to read.
- Allow sufficient white space.
- Avoid large blocks of dense text.
- Use many meaningful headings (and captions for graphics).
- Use lists, tables, and other graphic elements where possible to express lengthy or complex material.
- Use design to illustrate structure and meaning.
- Don't sacrifice clarity to attractive design.

Content

- Don't assume the reader knows something (unless you're sure they do).
- Include the information the reader wants to know—then think about what they might ask about next, and include that too.
- Omit superfluous material.
- Use words familiar to the readers where they would give the precise meaning.
- Where no such word exists, explain the more complex words.
- Give examples to explain difficult ideas.
- Always use the same word to mean the same thing.
- Omit words and concepts the reader doesn't need (except those worth including for interest).

1.5 Appendix—More definitions

None of these examples are 'pure' examples of one of our three types. Therefore, we have not tried to put them into one of the categories.

Connecticut consumer legislation

Connecticut's consumer legislation requires plain language contracts but offers businesses a choice between a formulaic (option 1) test and an elements (option 2) test. A contract is deemed to be in plain language if it passes ei-

ther test, even if it fails the other. This seems so arbitrary as to discredit both tests. On the other hand, it may strike a workable compromise between the need for certainty in law and the need for fairness and flexibility. To qualify under the first test, a contract must fully meet all of the following criteria, using the counting procedures described in section 42-158:

1. The average number of words per sentence is less than 22.
2. No sentence in the contract exceeds 50 words.
3. The average number of words per paragraph is less than 75.
4. No paragraph in the contract exceeds 150 words.
5. The average number of syllables per word is less than 1.55.
6. It uses personal pronouns, the actual or shortened names of the parties to the contract, or both, when referring to those parties.
7. It uses no type face of less than eight points in size.
8. It allows at least three-sixteenths of an inch of blank space between each paragraph and section.
9. It allows at least one-half of an inch of blank space at all borders of each page.
10. If the contract is printed, each section is captioned in boldface type at least 10 points in size. If the contract is typewritten, each section is captioned and the captions are underlined.
11. It uses an average length of line of no more than 65 characters.

Connecticut's second option deems a consumer contract to be in plain language if it substantially meets these criteria:

It uses short sentences and paragraphs.

It uses everyday words.

It uses personal pronouns, the actual or shortened names of the parties to the contract, or both, when referring to those parties.

It uses simple and active verb forms.

It uses type of readable size.

It uses ink which contrasts with the paper.

It heads sections and other subdivisions with captions which are in boldface type or which otherwise stand out significantly from the text.

It uses layout and spacing which separate the paragraphs and sections of the contract from each other and from the borders of the paper.

It is written and organised in a clear and coherent manner.

Source: Conn. Gen. Stat. S 42-152.

Michèle Asprey

Some people think that because plain language is simple, it must be simplistic—a kind of baby talk. That is also wrong. Simple in this sense doesn't mean simplistic. It means straightforward, clear, precise. It can be elegant and dramatic. It can even be beautiful ... Just ... clear, straightforward language, with the needs of the reader foremost in mind.

Source: *Plain Language for Lawyers*, Federation Press, 3rd edn, 2003, pp 11-12.

Robert Eagleson

Clear, straightforward expression, using only as many words as are necessary. It is language that avoids obscurity, inflated vocabulary and convoluted construction. It is not baby talk, nor is it a simplified version of ... language.

Source: *Writing in Plain English*, Australian Government Publishing Service, 1990, p. 4.

Bryan Garner

Plain English is robust and direct, the opposite of gaudy, pretentious language. It uses the simplest, most straightforward way of expressing an idea. It uses everyday words. Generally speaking, [it is] the idiomatic and grammatical use of language that most effectively presents ideas to the reader.

Source: *Legal Writing in Plain English* and *Dictionary of Modern Legal Language*, 1995, p. 662

Plain English Foundation

Plain language communication works with and tests the content, structure,

expression and document design of a text so that its audience can readily find what they need, understand what they find, and act effectively on that understanding.

Source: Plain English Foundation, Australia, www.plainenglishfoundation.com

Business dictionary

Clear, direct, and 'honest' expression in speech and writing. Plain language is free from jargon and rarely used words and terms, and comes straight to the point being addressed.

Source: www.businessdictionary.com/definition/plain-language.html 15.2.09

Derived from the Social Security Administration Notice Standards

[Plain English is:]

Logically sequenced

Pertinent

Sufficient for reader to take action

Clear and simple

Avoids jargon and legal terms

Grammatically correct

Source: SSA Pub. No. 67-003.

Australian Commonwealth Industrial Relations Commission on plain English:

Plain English is, in our view, clear and precise language which is easy to understand and which communicates its message effectively. It is not a simplified form of English. It puts the reader first and avoids archaic words, jargon, unnecessary technical expressions and complex language. Plain English is not just about words. It means using plain language to express ideas so that they make sense to the reader and designing documents so that information is easy to find and understand ... Using plain English does not mean sacrificing precision.

Source: Award Simplification Decision (1997 75 IR , p. 305), quoted by Peter Butt & Richard Castle: *Modern Legal Drafting*, 2nd edn, 2006, p. 124

[Derived from] Lee Clark Johns

Plain writing:

1. Is reader-friendly, focused on the reader not the writer.
2. Is organised logically with the main idea up front.
3. Has a good balance of key points and supporting evidence.
4. Uses appropriate words that are clear to the reader.
5. Uses clear, grammatically correct sentences.
6. Has a predictable format.

Source: *The Writing Coach*, 2004, Thomson Learning, Inc.

Office of Parliamentary Counsel, Australian Commonwealth

Plain language drafting refers to a range of techniques designed to create legislation that is readable and easy to use by the relevant audience(s) for that legislation.

At the level of vocabulary, plain language drafters try to use words and expressions that are familiar to everyone. Although technical language is sometimes necessary to achieve an acceptable level of precision, unnecessary jargon and gratuitous obscurity are eliminated.

At the level of syntax, plain language drafters try to create sentence patterns that are easy for the average person to process. According to the experts, such sentences tend to be short, avoid embedding, and branch to the right. They rely on verbs rather than nouns, the active rather than the passive voice, and positive rather than negative formulations to state the intended law.

At the level of structure, plain language drafters try to organise statutes in a clear and meaningful way. The sequencing of provisions is based on chronological order, logical order, order of importance or some other principle or combination of principles that is likely to make sense to the reader. Equally important, the structure of the statute is clearly revealed to the reader through use of headings and subheadings, marginal notes, transitions, tables of contents, summaries and the like.

Plain language drafters also draw on the research and insights of experts in document design. They pay as much attention to fonts and white space as they do to choice of words. They try to devise methods of presenting material visually that will assist the reader to use the statute book effectively, and with minimum effort.

Finally, plain language drafters try to provide information that will help readers to interpret the text. Such information typically takes the form of purpose statements, explanatory notes, examples, summaries, overviews and the like.

Source: www.opc.gov.au/plain/index.htm 15.2.09

Law Reform Commission of Victoria on plain English

'Plain English' involves the use of plain, straightforward language which avoids these defects [listed earlier] and conveys its meaning as clearly and simply as possible, without unnecessary pretension or embellishment. It is to be contrasted with convoluted, repetitive and prolix language. The adoption of a plain English style demands simply that a document be written in a style which readily conveys its message to its audience. However, plain English is not concerned simply with the forms of language. Because its theme is communication, it calls for improvements in the organisation of the material and the method by which it is presented. It requires that material is presented in a sequence the audience would expect and helps them to absorb it. It also requires that a document's design be as attractive as possible in order to help readers find their way through it.

Source: *Plain English and the Law* (Report, 1987, para 57)

Pennsylvania consumer legislation

Test of readability

(a) General rule: All consumer contracts executed after the effective date of this act shall be written, organised and designed so that they are easy to read and understand.

(b) Language guidelines: In determining whether a contract meets the requirements of subsection (a), a court shall consider the following language guidelines:

(1) The contract should use short words, sentences and paragraphs.

(2) The contract should use active verbs.

(3) The contract should not use technical legal terms, other than commonly understood legal terms, such as 'mortgage', 'warranty' and 'security interest'.

(4) The contract should not use Latin and foreign words or any other word whenever its use requires reliance upon an obsolete meaning.

(5) If the contract defines words, the words should be defined by using commonly understood meanings.

(6) When the contract refers to the parties to the contract, the reference should use personal pronouns, the actual or shortened names of the parties, the terms 'seller ' and 'buyer' or the terms 'lender' and 'borrower'.

(7) The contract should not use sentences that contain more than one condition.

(8) The contract should not use cross references, except cross references that briefly and clearly describe the substances of the item to which reference is made.

(9) The contract should not use sentences with double negatives or exceptions to exceptions.

(c) Visual guidelines: In determining whether a contract meets the requirements of subsection (a), a court shall consider the following guidelines:

(1) The contract should have type size, line length, column width,

margins and spacing between lines and paragraphs that make the contract easy to read.

(2) The contract should caption sections in boldface type.

(3) The contract should use ink that contrasts sharply with the paper.

Source: Plain Language Consumer Contract Act, Pa. Stat. Ann. Tit. 73, §§ 2201,2205

Joe Kimble, 'Elements of plain language'

A. In general

1. As the starting point and at every point, design and write the document in a way that best serves the reader. Your main goal is to convey your ideas with the greatest possible clarity.
2. Resist the urge to sound formal. Relax and be natural (but not too informal). Try for the same unaffected tone you would use if you were speaking to the reader in person.
3. Omit unnecessary detail. Boil down the information to what your reader needs to know.
4. Use examples as needed to help explain the text.
5. Whenever possible, test consumer documents on a small group of typical users—and improve the documents as need be.

B. Design

1. Make a table of contents for long documents.
2. Use at least 10- to 12-point type for text, and a readable serif typeface.
3. Try to use between 50 and 70 characters a line.
4. Use ample white space in margins, between sections, and around headings and other special items.
5. Use highlighting techniques such as boldface, italics, and bullet dots. But don't overdo them, and be consistent throughout the document.
6. Avoid using all-capital letters. And avoid overusing initial capitals for common nouns (*this agreement, trust, common stock*).
7. Use diagrams, tables, and charts as needed to help explain the text.

C. Organisation

1. Use short sections, or subdivide longer ones.
2. Put related material together.
3. Order the parts in a logical sequence. Normally, put the more important before the less important, the general before the specific, and the ordinary before the extraordinary.
4. Use informative headings for the main divisions and subdivisions. In consumer documents, try putting the main headings in the form of a question.
5. Minimise cross-references.
6. Minimise definitions. If you have more than a few, put them in a separate schedule or glossary at the end of the document.

   (The next four items apply to analytical documents, such as briefs and memos, and to most informational documents.)

7. Try to begin the document and the main divisions with one or two paragraphs that introduce and summarise what follows, including your answer.
8. Use a topic sentence to summarise the main idea of each paragraph or of a series of paragraphs on the same topic.
9. Make sure that each paragraph develops the main idea through a logical sequence of sentences.
10. Use transitions to link your ideas and to introduce new ideas.

D. Sentences

1. Prefer short and medium-length sentences. As a guideline, keep the average length to about 20 words.
2. Don't pile up a series of conditions or qualifiers before the main clause.
3. In most sentences, put the subject near the beginning; keep it short and concrete; make it something the reader already knows about; and make it the agent of the action in the verb.

4. Put the central action in strong verbs, not in abstract nouns. ('If the seller delivers the goods late, the buyer may cancel the contract.' Not: 'Late delivery of the goods may result in cancellation of the contract.')
5. Keep the subject near the verb, and the verb near the object (or complement). Avoid intrusive phrases and clauses.
6. Put the strongest point, your most important information, at the end—where the emphasis falls.
7. Prefer the active voice. Use the passive voice if the agent is unknown or unimportant. Or use it if, for continuity, you want to focus attention on the object of the action instead of the agent. ('No more legalese. It has been ridiculed long enough.')
8. Connect modifying words to what they modify. Be especially careful with a series: make clear whether the modifier applies to one or more than one item. (Examples of ambiguity: 'educational institutions or corporations'; 'a felony or misdemeanor involving dishonesty'.)
9. Use parallel structure for parallel ideas. Consider using a list if the items are at all complicated, as when you have multiple conditions, consequences, or rules. And put the list at the end of the sentence.

E. Words

1. Prefer familiar words—usually the shorter ones—that are simple and direct and human.
2. Avoid legal jargon: stuffy old formalisms (Now comes; In witness whereof); here-, there-, and where-words (hereby, therein, wherefore); unnecessary Latin (arguendo, inter alia, sub silentio); and all the rest (and/or, provided that, pursuant to, the instant case).
3. Avoid doublets and triplets (any and all; give, devise, and bequeath).
4. In consumer documents, explain technical terms that you cannot avoid using.
5. Omit unnecessary words.
6. Replace wordy phrases. Take special aim at multiword prepositions (prior to, with regard to, in connection with). And treat the word 'of' as a good indicator of possible flab (the duty of the landlord, an order of the court).
7. Banish shall; use must instead.
8. In consumer documents, consider making the consumer 'you'.
9. Avoid multiple negatives.
10. Be consistent; use the same term for the same thing, without thinking twice.

Source: 'The Elements of Plain Language' in *Lifting the Fog of Legalese.* Carolina Academic Press, Durham, NC. 2006.

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Dr. Cheek *is an anthropologist by training, earning a PhD from the University of Arizona in 1974. She worked for the United States federal government from 1980 until early 2007. Most of her Federal career focused on writing and implementing regulations. She spent four years as the chief plain language expert on Vice President Gore's National Partnership for Reinventing Government.*

Annetta was the chair of the interagency plain language advocacy group, PLAIN, since it was founded in 1995 until she retired from the government. She also administered the group's website, www.plainlanguage.gov. She served for five years as an Executive Assistant to the Administrator of the Federal Aviation Administration, focusing on plain language projects and serving on the Web Council. She is the Chair of the board of the Center for Plain Language and the Director of Plain Language Programs for NOVAD Consulting and R3I Consulting, DC-area consulting firms.

2. Setting plain language standards

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Overview

Perhaps the most challenging question that the plain language community faces is how to establish an international plain language standard. This chapter sets out the issues and options we will need to consider, but it does not yet define that standard or recommend what it should be.

Characteristics of a plain language standard

To begin, we felt it would be useful to identify the characteristics of a 'perfect' plain language standard—one that would leave no doubt that a text was truly in plain language. Based on our own experience, such a standard would:

- acknowledge readers and their need to understand and use information
- place the responsibility on writers to clarify their thinking
- acknowledge the judgement required in writing effective documents for readers
- prioritise 'big picture' concerns such as purpose, structure, and navigation that influence the success of a whole document
- include more detailed concerns such as sentence length, word choice, and grammar
- include some form of reader testing
- be applicable across all languages, documents, and audiences.

Elements versus outcomes—a false debate?

Historically, discussion about creating international plain language standards has tended to polarise practitioners into two camps: should standards be based on a checklist of elements or on a test of user outcomes?

In this chapter, we use the term *elements* to mean the various writing techniques authors use to make a document more readable, such as creating a clear structure, crafting informative headings or using precise and familiar words. By *outcomes* we mean the results of testing document users (readers) to see if they can understand the text and do what the writer intended and what they need.

There are strong arguments for both types of standards. But perhaps we have been engaged in a false debate. Rather than allowing a dichotomy to bar progress, this chapter looks at the merits of both and suggests a combination of the two. This acknowledges that a document using plain language techniques will be more readable and fit for purpose than one that doesn't. But it also argues that testing provides the ultimate proof.

Three approaches

To move ahead constructively in developing a standard, we have identified three approaches:

- elements only
- outcomes only
- a combination of these two.

In discussing these three approaches, we have identified five options for a plain language standard and will discuss the advantages and disadvantages of each.

Recommendations

We put forward the following issues and tasks for the plain language community to resolve as it works towards an international plain language standard:

Defining what we mean by 'plain language standards'

1. Agree on the nature of a plain language standard and whether to use the ISO model or an alternative framework.
2. Agree on the terminology used for the standard—singular or plural.

Deciding how a standard would be used

3. Agree on who would use a plain language standard and in what circumstances.
4. Agree on whether the standard should initially apply to English texts and extend as quickly as possible to other languages, or accommodate all languages from the start.

Deciding on the form of a standard

5. Decide whether the standard should be:
   - Option 1: elements-based, detailed and specific to a single language.
   - Option 2: elements-based, less detailed and not language-specific.
   - Option 3: solely outcomes-based.
   - Option 4: tiered, including elements as mandatory and outcomes in a second tier.
   - Option 5: integrated, mandating both elements and outcomes.

Setting up a standards committee to pursue this work

6. Form a committee, perhaps within the IPLWG, to progress this work by:
   - gathering the views of the international community about who will use the standard, how it will be used, and what form it should take
   - producing a first carefully researched standard for plain language
   - setting up a revision process
   - working with other committees or bodies charged with related tasks in this options paper.

2.1 Defining the term 'standards'

To discuss standards, we first need to clarify what we mean by the word. The words 'guidelines' and 'principles' are often used interchangeably with 'standards.'

The word 'guidelines' implies a set of leading practices or preferred ways of doing things. The word 'principles' is frequently associated with conduct, moral standards, or truth. Neither word implies an authoritative set of criteria or individual elements that must be met, which is a useful way to interpret the word standards in the context of plain language.

The Oxford Dictionary of English includes two applicable definitions of a standard:

1. 'a required or agreed level of quality or attainment' (half of the beaches fail to comply with European standards)
2. 'something used as a measure, norm, or model in comparative evaluations' (the system had become an industry standard).

The following Wikipedia entry is also useful.

> Standards are produced by many organisations, some for internal usage only, others for use by groups of people, groups of companies, or a subsection of an industry. A problem arises when different groups come together, each with a large user base doing some well-established thing that between them is mutually incompatible.
>
> There are many National Standards, but overall the International Organization for Standardization, based in Geneva, Switzerland has established tens of thousands of standards covering almost every conceivable topic. Most of these are then adopted worldwide replacing all the incompatible 'homegrown' standards. Many of these are naturally evolved from those designed in-house within an industry, or by a particular country, while

others have been built from scratch by groups of experts who sit on various Technical Committees.

We need to agree on the nature of a plain language standard and whether to use the ISO model or an alternative.

An additional problem is that plain language practitioners talk about both 'standards' and 'a standard'. We note that the ISO standards system uses the singular 'Standard' to embody all the individual 'requirements'.

Recommendations

That the plain language community agree on:

1. the nature of a plain language standard and whether to use the ISO model or an alternative framework
2. the terminology used for the standard—singular or plural.

2.2 Establishing the intended use for a plain language standard

To make sound decisions on the form of a plain language standard, we must next establish who will use it and how it will be used. These fundamental decisions will drive many of those that follow about the standards, including which option we choose. Following are the main questions we need to answer early on.

Who will use the standard?

Is the standard for plain language practitioners only? Is it for plain language practitioners who have been accredited to assess against the standard? Or is the standard to be published as a guide for all writers to use? Will the clients of plain language practitioners use it to determine whether work done for them is indeed in plain language?

How will the standard be used?

Will the standard be represented by a logo that shows a document has met the standard? Will plain language practitioners or some other group assess that a document can use the logo? Even without a logo, how will the assessment of meeting the standard be made? In short, who can make the statement that 'this document meets the plain language standard'?

Further, how will practitioners want to use the standard? Will they use it to give credibility to their work? Will they 'sell' clients on the idea that their documents meet the international standard?

Will organisations use the standard to show that their documents are in plain language and that they value clear, open communication? Will they publicise that their documents or some of their documents are in plain language? Who will then do the certification of a company's documents?

What documents will the standard apply to?

To what types of documents does the standard apply? Are internal and external documents treated differently? Will electronic media require a different standard? Would interactive or dynamic media require a different standard?

How will the standard work internationally?

To be accepted internationally, a plain language standard will have to work across languages. Section 2.3 'Exploring an elements-based standard' discusses this topic in more detail.

Given that many practitioners already use some form of plain language standard, and many more are interested in the concept, it should be relatively quick to gather meaningful information on these questions. Perhaps a series of short surveys over several months could be widely distributed to gather responses from the international community.

Recommendations

That the plain language community agree on:

3. who would use a plain language standard and in what circumstances
4. whether the standard should initially apply to only English texts and extend as quickly as possible to other languages, or accommodate all languages from the start.

2.3 Exploring an elements-based standard—options 1 and 2

This section discusses:

- the general advantages of an elements-based standard
- current standards in use
- two options for what an elements-based standard could include
- some apparent disadvantages.

Whatever elements-based standard we might create, we would have to apply it in the context of writers' purposes and their documents' readers. In addition, all of the elements in a plain language standard should be based on current research and be updated as new research emerges.

What are the advantages of an elements-based standard?

An elements-based standard:

- addresses issues, known from research and experience, that are most likely to affect reader comprehension
- offers the means to assess a document in a relatively quick, cost-effective way
- does not require any special set up or resources
- gives the writer or document owner research-based feedback and a greater appreciation of plain language techniques
- is easier for most people (practitioners and those within an organisation) to grasp because it tends to be more concrete
- may be used more widely than a standard that includes testing.

Are there any elements-based standards in use?

Several different elements-based standards are currently used in various parts of the world. Most of these will provide an associated logo to indicate that a particular document has met a defined plain language standard.

Examples of plain language standards currently in use include:

- the Plain Language Commission's document accreditation (Martin Cutts, United Kingdom)
- the PlainLanguage.gov's 'Federal Plain Language Guidelines' (Amy Bunk and Kathryn Catania, United States)
- Wordsmith Associates' criteria for achieving Wordmark Certification (Christine Mowat, Canada)
- the Center for Plain Language's criteria for achieving a ClearMark Award (Susan Kleimann and Annetta Cheek, United States)
- the Plain English Foundation's 'verbumetric' document evaluation system and Plain English Standard (Neil James, Australia)
- Write Limited's criteria for achieving the WriteMark Plain English Standard (Lynda Harris, New Zealand)
- the Plain English Campaign's criteria for achieving a Crystal Mark (United Kingdom).

All of these examples are focused on the needs of the audience and cover topics such as purpose, content, structure, design, expression, and style. However, they include different levels of detail and emphasis.

Settling the definitive content for an elements-based standard is outside the scope of this paper. Instead, we present two different options:

- Option 1: an elements-based standard that is detailed and specific to a single language.
- Option 2: an elements-based standard that is less detailed and not language-specific.

Option 1: elements-based standard detailed and specific to one language

The type of detail a standard that is specific to a language may include (in this case the English language) is illustrated in Martin Cutts' *Oxford Guide to Plain English* in his 'Summary of guidelines'. The key points of this summary are:

Style and grammar

- Make the average sentence length of 15-20 words.
- Use words your reader is likely to understand.
- Use only as many words as you need.

- Prefer the active voice unless there's a good reason for using the passive.
- Use clear, lively verbs to express actions.
- Use vertical lists to break up text.
- Put your points positively when you can.
- Reduce cross references to a minimum.
- Avoid sexist usage.
- Use accurate punctuation.

Organisation

Organise your material in a way that helps the reader to grasp the important information early and to navigate through the document easily.

Layout

Use clear layout to present your words in an easily accessible way.

Christine Mowat has written a much more detailed set of elements, published in the preliminary draft of this paper distributed at the 2009 PLAIN conference in Sydney. Space constraints mean we cannot include them here, but we suggest any close examination of elements for an Option 1 standard should refer to Christine's work.

The specific disadvantage to Option 1 is that many of the elements will not travel across languages. This would mean creating different versions of the standard for different languages. It also shares the general advantages and disadvantages of an elements-based standard discussed below.

Option 2: elements-based standard less detailed and not language-specific

In option 2, the standard would comprise a set of statements that would describe a plain language document, regardless of which language it was written in. For example, a standard that identifies elements such as 'Structure and navigation are obvious and well-marked so the audience can find the information they need' can potentially be shared across languages.

In this approach, we would not stipulate how plain language specialists or anyone else will make detailed judgements about each element. But the statements under the standard could be supported by language-specific guidelines or checklists. In the same way, this type of standard could be usefully applied to many varied situations that require slightly different guidelines or checklists, such as in health information.

To illustrate, the ClearMark Awards criteria from the United States Center for Plain Language and the New Zealand Write Limited's standard are elements-based standards that could potentially cross languages. Both of these are supported by more detailed checklists of elements that are specific to the English language.

The ClearMark Criteria (amended for this paper)

The scoring criteria for the ClearMark Awards cover the key characteristics of a plain language document. The topics were intentionally phrased to capture characteristics of both paper and electronic documents and with the idea that these criteria might work across languages. Testing is included as a requirement.

Category	Criteria for document (or web page)
Purpose and approach	The purpose is clear and considers who will use the document, why they would use it, and what tasks they will do with it.
Design	The design and layout reinforce meaning and make it easy for the audience to see, process, and use the information.
Structure	Structure and navigation are obvious and well-marked so the audience can find the information they need.
Hierarchy	The hierarchy helps the audience distinguish between critical and less important information.
Language	Plain language techniques (such as straightforward sentence structure, strong verbs, precise word choice) are used to ensure the audience can read, understand, and use the information.

Category	Criteria for document (or web page)
Impact	The writer or the organisation as the writer comes across as reliable and trustworthy.
Testing	The testing uses an acceptable methodology, appropriate for the combined impact, importance, and type and number of people who will use this document.

The Center has also developed a more detailed checklist that matches the topics of the criteria. As an example, here is the Design element with its checklist items added:

> The Design reinforces meaning and makes it easier for the audience to see, process, and use the information. Consider if the design:
>
> - organises the information in a sequence that's logical for the audience
> - uses layout to make information easy to find, understand and use
> - use principles of good design—including appropriate typography, font size, line spacing, color, white space and so on
> - uses visuals to make concepts, information and links easier to see and understand
> - for online information, minimises the number of levels
> - for online information, layers information appropriately, avoiding too much on one page.

The Write Limited Short Plain English Standard

Write Limited in New Zealand uses the following as its in-house standard that all company documents must meet. This same standard is also used in various ways by Write clients. It comprises a set of statements that describe a reader-focused document in English.

The Standard is accompanied by a more detailed checklist (not included here) that interprets the standard and provides questions for a writer or reader to use to more fully understand what Write Limited means.

Big picture elements

1. The purpose of the document is clear at the start.
2. The content supports the purpose of the document.
3. The structure of the document is clear and logical to the reader.

Language elements

4. The paragraphs are mostly short and focus on one topic.
5. The sentences are mostly short and straightforward.
6. The words are precise and familiar.
7. The tone supports the purpose of the document.

Presentation elements

8. The layout and presentation help the reader absorb the messages quickly and easily.
9. The document is error free.

The specific advantage to Option 2 is that a single standard will work across languages. The specific disadvantages to Option 2 are that it requires:

- a greater level of judgement
- an accompanying checklist with more language-specific details.

What are the disadvantages of an elements-based standard?

Whatever decision we might make about specific elements, an elements-based standard has the following disadvantages:

- It will be difficult to agree on what elements to include and the level of detail required for each element.
- Some elements require a high level of judgement, such as 'Use clear layout to present your words in an easily accessible way', and thus may be open to broad interpretation.
- The broad accessibility of an elements-based standard can lead to uninformed or inappropriate use by non-practitioners.

- No matter how well a document scores on an elements-based assessment, without testing it cannot guarantee that it will work as intended for the reader.

2.4 Exploring an outcomes-based standard—option 3

The next option we discuss is to create an entirely outcomes-based plain language standard. This involves testing documents with real users to discover how well they are understood and whether they fulfil their purpose.

What are the advantages of an outcomes-based standard?

Few would argue against the value of testing a document on a sample that reflects the people who will use it. The outcome—whether the document is understood by the intended readers, or not—is revealed by hard data.

An outcomes-based standard:

- reveals what readers understand and where a document has weaknesses
- picks up more subtle features such as the inferences readers take from a document
- provides data about how the document is working that goes beyond author opinion
- reveals what intended readers think when they read the document and what they are likely to do in response
- reveals the strengths and weaknesses of the writer's assumptions about the readers.

Are there any outcomes-based standards in use?

In our reading and discussions, we have not found any universally accepted standard for testing documents with users. Nor does it appear that any private practitioners have set their own standard and termed it as such.

In part, this is because reader testing embodies a range of different tests, such as cognitive interviews, usability testing, timed testings, or paraphrase testing. Each has a specific purpose and outcome, and each has a range of techniques to gather data. Both qualitative and quantitative testing is grounded in a rich and rigorous research tradition with specific techniques and approaches. In any well-designed test, the type chosen depends on the questions to be answered, the time available, the population targeted, and the potential impact of the document.

What unifies an outcomes-based standard is its focus on whether readers can understand the document. This is the ultimate judgement of a document's success. Without reader testing, any assessment of a document is a hypothesis of what will work.

Outcomes testing does not negate the use of other standards, techniques, questions, or checklists. But advocates of an outcomes-based standard argue that it is only by testing with readers or end users that authors can ultimately identify whether the document succeeds.

What are the main objections to an outcomes-based standard?

There are two objections to adopting an outcomes-based standard alone as the standard for plain language: the feasibility of testing all types of documents and the time and money it takes to test.

The feasibility of testing

At a pragmatic level, it is simply not possible to test every document. For example, it would be hard to justify formal usability testing of documents intended for a single reader, such as is the case for many emails or internal memos. There may be little point in testing the minutes of a meeting with 'representative' readers before sending them directly to participants. And it is highly unlikely, for example, that executive readers or government ministers would take the time to participate in a document test before reading a revised version.

So an outcomes-based standard may not mean that every document must be tested with its intended readers. The difficult issue is how to define the point at which testing should be mandatory. Testing is clearly more crucial for documents that have high public visibility, provide critical information, are widely distributed, or have potentially life-affecting consequences. But can we define these precisely enough to cover all document types, contexts and languages?

Resolving this first concern about an outcomes-based standard will follow in part from the more fundamental question of how a plain language standard would be used. It may be,

for example, that the types of documents that are not feasible for testing are less likely to be put forward as meeting a plain language standard. While this would get around the problem, this assumption could be wrong and would need further debate.

The cost of testing

The second objection to establishing an outcomes-based standard is the perception of cost—both in money and time. Let us be clear: reader-testing need not be an arduous, expensive, or time-consuming task. Testing cost is predominantly driven by the size of the sample and by the number of locations that the research design (and the client) stipulates. Some testing can be expensive, but in other cases it can be relatively inexpensive.

The characteristics of a document and its use will drive the costs: the higher the visibility, criticality, distribution, and impact of a document, the more crucial testing becomes. So time and money will be relative to impact. Again, as we answer the questions about using the plain language standard, we will see more clearly whether this option is viable.

What form might an outcomes-based standard take?

Given the variety and complexity of testing techniques, it would be challenging to write a highly prescriptive outcomes-based standard. However, the goal of the standard should not be *how* to conduct the testing, but more to provide parameters about the intended outcomes.

A collection of guidelines or leading practices for an outcomes-based standard would need some minimum criteria. There could be guidelines on the following aspects.

Form of criteria

We could:

- set a series of prescriptive testing regimes with specified criteria
- establish a set of leading-practice guidelines
- recognise any type of user test as valid.

Skill of practitioner

We could agree that to achieve an outcomes-based standard, testing could be carried out by:

- accredited professionals
- any well-established professional or organisation that includes user testing as a core service
- any person or organisation who devises and carries out a test.

What are the disadvantages of an outcomes-based standard?

An outcomes-based standard is likely to have some further disadvantages:

- Each document test plan depends on the research questions, the selection of the technique, the schedule, and the budget. This means it is difficult to identify precise parameters across all tests.
- Each document test plan depends on the skill of the practitioner. A poorly framed reader test, with inadequate or flawed analysis will have questionable results.
- The acceptance of testing by the clients of practitioners will vary depending on their knowledge and the general acceptance within an industry.
- Some documents with low visibility, small audiences, low criticality, and low distribution do not warrant an investment in testing and could never meet an outcomes-based standard for plain language. This may impair the universal acceptance of that approach.

2.5 Exploring a combination standard—options 4 and 5

A combination standard would combine elements-based and outcomes-based assessment. Here we explore two options.

- Option 4 is a tiered approach in which the first tier does not include reader-testing and the second tier does.
- Option 5 is an integrated approach that mandates reader-testing as a part of the standard.

A combined standard offers the following advantages:

- it demonstrates that a document incorporates plain language elements
- it demonstrates that a document achieves its outcomes for readers.

We believe that a combination standard may provide the solution to bridging the divide

between elements-based and outcomes-based advocates. But as with the previous options, our final decisions will be influenced by the fundamental questions raised earlier about who will use the standard and under what circumstances.

Option 4: tiered standard

A tiered standard would include:

- a first tier in which a document would be assessed against its use of plain language elements discussed in Option 2
- a second tier in which a document has a dual assessment based on plain language elements combined with reader testing (Options 2 and 3).

What are the advantages of option 4?

A tiered standard:

- acknowledges that many practitioners use elements-based assessment
- means that clients can meet a plain language standard to a certain level even where they will not invest in testing
- encourages testing by reserving the second tier for documents that have been tested.

What are the disadvantages of option 4?

At the same time, a tiered standard means that:

- testing may be seen as 'added-value' rather than integral to a truly reader-focused document.
- the elements-based standard could become the default standard if plain language practitioners (or their clients) do not embrace the second tier.

Option 5: integrated standard

An integrated standard requires an assessment with both an elements-based standard and an outcomes-based standard. In this option, testing is a mandatory part of the standard.

What are the advantages of option 5?

An integrated standard:

- incorporates an elements-based assessment as an integral part of the standard
- incorporates the outcomes-based assessment as an integral part of the standard
- means that using only elements-based or only outcomes-based standards are exceptions to the integrated standard.

What are the disadvantages of option 5?

An integrated standard:

- could limit the number of documents that can meet a plain language standard
- could limit the practitioners able to produce documents meeting the standard
- increases the learning curve of practitioners who are not currently testing
- means that documents that are not tested cannot meet a plain language standard
- accepts that the standard sets the highest bar.

Recommendation for sections 2.3, 2.4, and 2.5

5. The plain language community should decide whether the standard should be:

- Option 1: elements-based, detailed and specific to a single language.
- Option 2: elements-based, less detailed and not language-specific.
- Option 3: solely outcomes-based.
- Option 4: tiered, including elements as mandatory and outcomes in a second tier.
- Option 5: integrated, mandating both elements and outcomes.

2.6 Setting up a working committee

The options and recommendations put forward in this chapter need to be thoroughly debated throughout the international plain language community to enable sound decision-making. There is so much to work through that the International Plain Language Working Group or some similar body will need to establish a dedicated working committee to foster constructive debate and move toward more concrete decisions.

The early focus of this work will need to be on the intended use for a standard and its form and content. Once the form of a plain language standard is agreed, a committee or working group should then be charged with exploring ways to maintain the integrity of the standard across countries and users. The

committee will need to devise, test, and agree on moderation processes.

Any agreed plain language standard will then need revising, particularly in the early years of use. We will need to decide on an effective process.

Recommendation

6. We recommend that the plain language community form a committee, perhaps within the International Plain Language Working Group, to progress this work by:

- gathering the views of the international community about who will use the standard, how it will be used, and what form it should take
- producing a first carefully researched standard for plain language
- setting up a revision process
- working with other committees or bodies charged with related tasks in this options paper.

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Lynda also established the WriteMark, New Zealand's document quality mark, and is the founder of New Zealand's annual plain English awards. Lynda is the country representative for Clarity and a member of the International Plain Language Working Group.

Dr Susan Kleimann, *President of the Kleimann Communication Group, is an internationally recognised plain language expert with over 30 years of experience providing thoughtful technical communication expertise to numerous organisations. Dr Kleimann has led transformative research, design, and organisational process projects related to public policy documents with a high visibility and far-reaching impact for multiple government agencies.*

She is a frequent speaker on the wide range of plain language issues, and has presented her views to audiences in the Netherlands, New Zealand, Canada, Australia and Mexico. Dr Kleimann previously served as the Director of the Document Design Center at the American Institutes of Research and as the first Executive Director of the Center for Plain Language in Washington, DC.

Before starting Wordsmith Associates in 1980, **Christine Mowat** *taught English to adults for 13 years in England, Kenya, and Canada. Since its inception, Wordsmith has conducted plain-language writing workshops for over 30,000 participants with instructors in Edmonton, Calgary, Regina, and Vancouver.*

Christine has authored over 30 articles, co-edited a textbook, Native Peoples in Canadian Literature, *and designed and instructed eight Wordsmith programs, including* Improving Legal Writing**.** *Christine is currently preparing a revised edition of* A Plain Language Handbook for Legal Writers, *originally published by Carswell in 1999.*

Christine was on the Executive Committee of PLAIN for seven years and served as President. She chaired the Toronto and Amsterdam PLAIN conferences in 2002 and 2007. PLAIN recognised her work with an award at its 2009 conference in Sydney.

3. Training for plain language

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Overview

This chapter sets out some issues and options for future training of plain language practitioners. Its recommendations will help the plain language community to make some informed decisions about the next steps.

In researching this section of the options paper, we found ourselves continually confronting gaps in the existing knowledge about:

- what constitutes plain language practice
- what a practitioner needs to know and do
- what training already exists
- what future training should be developed.

A great deal of research is needed to answer these questions before we can develop the right training options. As this will take time and money to achieve, we have looked at the funding sources available, and suggest that we seek support such as through the European Commission's Lifelong Learning scheme, which offers financial support for curriculum development.

Recommendations

We recommend as a first step conducting a survey of plain language practitioners worldwide to decide on the knowledge, skills and competence that a plain language practitioner needs so that this can be reflected in any future plain language training program.

We recommend using the European Qualifications Framework as a model to define the learning outcomes of a plain language training program.

We recommend seeking European funding to support further research and curriculum development through the European Commission's Lifelong Learning scheme. This could fund a foundational project with a number of university partners and the plain language community through an organisation based in Europe.

3.1 What do plain language practitioners do?

Before we can decide what training plain language practitioners need, we have to map what they actually do.

We conducted an informal survey and confirmed that plain language practice is very diverse, with practitioners working in a wide range of sectors and tasks. Some mainly teach writing to non-communications professionals, some work primarily as editors or document designers, and others work to change an organisation's overall communications culture. While some work in-house as part of the communications staff of their employer, many operate their own consultancy service, often as a single-person business.

Following are probably the most common services that plain language practitioners provide:

- writing of clear, concise, well-organised texts
- substantive editing or plain language rewriting
- copy or style editing
- proofreading documents
- assessing individual documents
- evaluating organisational communications

- implementing organisation-wide plain language programs
- developing in-house standards for communications
- training professionals in how to write plain language
- training plain language trainers
- producing in-house style guides, writing guidelines or procedures
- developing templates and other document systems
- developing document design
- desktop publishing
- user testing of documents with their intended audience.

This list isn't complete, as there has never been a comprehensive survey of plain language practitioners to confirm the range of work that they do. This is the first problem that the plain language community must confront as it assesses its training requirements.

3.2 What does a plain language practitioner need to know and do?

While mapping what practitioners do is a first step, to develop effective training programs we then need to assess the knowledge, skills and competencies needed to do those tasks.

Knowledge

> Knowledge = the body of facts, principles, theories and practices related to plain language.

Our informal survey found that plain language practitioners need some or all of the following knowledge, depending on their specific area of practice:

- general linguistics
- the structure and features of their national language
- text genres in different contexts and disciplines
- user and task analysis
- editing theory and practice
- grammar, punctuation, style and word usage
- readability and document assessment
- adult education
- the production process for online and paper documents
- document design
- user testing
- current national language policies and issues.

As with the list of services above, this list is a starting point for discussion rather than a final account of the knowledge that practitioners take into their work.

Skills

> Skills = the ability to apply knowledge, complete tasks and solve problems.

To perform their different roles, plain language practitioners should be able to:

- assess texts
- write copy
- edit or rewrite texts
- develop documentation such as style guides
- design document layouts
- develop communications strategies for organisations
- work with subject matter experts
- work with graphic artists
- develop and conduct training
- design and conduct user testing.

Competence

> Competence = the proven ability to use knowledge, skills and personal, social and technical abilities in work or study situations and in professional and personal development

For professionals to be effective, they must move beyond acquiring knowledge and developing skills to demonstrating they can apply that knowledge and skill. Our quick survey was not sufficient to map these competencies. Yet having a thorough understanding of what competencies plain language requires will be essential to develop the right kind of training.

We recommend the first step of a survey of plain language practitioners worldwide to make an inventory of the knowledge, skills and competence a plain language practitioner needs. This can then be reflected in a future plain language training program.

3.3 What plain language training already exists?

The next gap to fill in our knowledge is what training already exists for plain language practitioners. Here, we discovered that the educational backgrounds of practitioners is as diverse as the services they provide, and that very few countries in the world yet offer extensive and dedicated training in plain language, particularly at a university level.

University training

There are only a few courses dedicated to plain language at any university throughout the world. The most comprehensive is currently in Sweden.

Sweden

Stockholm University and Umeå University have a three-year university diploma in Swedish Language Consultancy (http://tiny.cc/96q9w). It is a very thorough education and students are equipped with skills to discuss linguistic issues at a theoretical level. The current list of courses and seminars are:

- Introductory courses in language, communication and society
- Text linguistics and discourse analysis
- The grammatical structure of the Swedish language
- Language technology and digital texts
- Sociolinguistics and pragmatics
- Rhetoric
- Printing and graphic design
- Pedagogy
- The changing world of languages—Language history
- Psycholinguistics
- Swedish as a second language (Stockholm)
- Translation
- English grammar and vocabulary (Umeå)
- Writing courses
- Professional practice—internship
- Linguistics theories in the 19th and 20th century
- Independent essay project.

However, if a training program should prepare students for the roles discussed above, this education may overqualify them. The Swedish degree also has the common academic problem of being too theoretical to prepare students for immediate practice in the workplace.

Växjö University also has a new shorter course in plain language skills of one semester. The prerequisite is a minimum two semesters of Swedish linguistics, but according to the course's superintendent, the applicants are far more qualified, with masters degrees or other postgraduate qualifications.

The Swedish Association for Plain Language Consultants (ESS) briefly evaluated the shorter course graduates and found that they are as well qualified as those with a diploma from Stockholm University in:

- proofreading
- writing clear, concise, straight-forward texts
- editing documents
- setting goals for clear communication
- producing in-house style guides and writing guidelines.

But it also found the shorter course graduates are not as well prepared for teaching professionals how to write. It is too early to draw any conclusions, but it seems that this shorter-course approach has better prepared students practically for the actual work.

Other countries

While we have not conducted a comprehensive survey, there is almost nothing as yet in other countries to match the Swedish training program. More often, where plain language is taught at university, it is part of a degree in communications, editing or information design. In some cases, such as in Mexico, it is one subject as part of a law degree at one university. But where it has a presence in a university, it is generally one component of a broader qualification rather

than a specific plain language qualification aimed at preparing graduates to work as plain language practitioners.

One recent exception in the English-speaking world is the interest expressed by Simon Fraser University in Canada, which means that university-level education for plain language practitioners may be possible within a couple of years in that country.

However, growing interest in plain language, and the passing of laws such as the *Plain Writing Act* in the United States, mean that there may be growing demand for qualifications in the field. Partnerships with recognised tertiary institutions are certainly one of the major options for the plain language community to pursue.

Government training

The second sector that is providing training in plain language is government. In Portugal, for example, a new Diploma in 'Simplification of Administrative Language' is being established at the National Institute for Public Administration (INA). This six-month course emerged from a partnership between INA and Português Claro, and aims to train public servants to develop plain language initiatives in their agencies.

In the United States, the first major government training program was at the Veterans Benefits Administration. Starting in the early 1990s, VBA embarked on a program to train 8000 employees in what they call 'reader-focused writing'. The National Institutes of Health offers an on-line training module, required for many of its employees but available free to anyone (http://plainlanguage.nih.gov/CBTs/PlainLanguage/login.asp). PLAIN, a group of federal language employees advocating for plain language, has offered a free half-day training session in principles of plain language since about 1997, and has trained about 10,000 employees across the government. All of these programs focus on techniques of plain language for writers, with some minimal attention to design concerns.

There are other examples of government-sector training in other countries, but they are similar to those in the United States and Portugal in that they generally focus on the practical needs of a public sector and do not integrate with the university sector. At times they do not lead to a recognised qualification.

Private providers

Outside the government and university sectors, private providers are currently filling some gaps in plain language training.

In Australia, the Plain English Foundation has trained almost 10,000 professionals, mostly in the government sector, through short courses of two or three days. In Canada, organisations such as Wordsmith have trained thousands more. In the United Kingdom, the Plain Language Commission also runs training for both public and private sectors. At most, these providers offer a certificate for participation rather than formally assessed qualifications.

Only one private organisation so far seems to offer a qualification in plain language. The Plain English Campaign in the United Kingdom has a training program that leads to a plain English diploma. According to the Campaign's website, the course lasts one year and concludes with a qualification in writing in plain English.

The Plain English Campaign's training raises potential problems surrounding a private educator providing accreditation unless they have formal recognition from their national education systems to do so. Ideally, the educator ought to have some kind of official endorsement as a form of quality control.

We have asked both the Plain English Campaign and a former student to evaluate the skills and the course, but the results are yet to come. This will also help us to evaluate the potential for private bodies to provide training for plain language practitioners.

3.4 What training model could plain language adopt?

Even our brief survey reveals that there is considerable work to be done to assess the actual work and the training needs of plain language practitioners before we can develop the best curriculum and devise how to mount it.

To work through this process and to make plain language training as international as possible, we could consider using the European Qualifications Framework for Lifelong

Learning (EQF) (http://ec.europa.eu/education/lifelong-learning-policy/doc44_en.htm).

All EU countries take part in the Bologna process, which helps to coordinate higher education in the EU member states. The EQF was created to make different countries' higher education and degrees more understandable and comparable across Europe. It uses eight reference levels of qualifications, from 'basic' to 'advanced'. The eight levels are described through their 'learning outcomes', which state the knowledge, skills and competence a student has after a specific learning process.

The EQF defines:

- 'knowledge' as the body of facts, principles, theories and practices related to a field of work or study
- 'skills' as the ability to apply knowledge and use know-how to complete tasks and solve problems
- 'competence' as the proven ability to use knowledge, skills and personal, social and/or methodological abilities, in work or study situations and in professional and personal development.

Using an established framework such as this would accelerate the development of plain language training by providing a solid theoretical and practical basis that is already recognised throughout Europe. This would also make it easier to attract university partnerships to offer courses in plain language.

Of course, the disadvantage is that the framework would not be as recognised in non-European countries, although it is likely that any courses developed through this framework can be adapted to other contexts. In the meantime, they will gain recognition throughout Europe and across many of the major languages.

We recommend using the EQF as a model to define learning outcomes of a future plain language training program. The starting point of this process should be:

- the existing knowledge about what plain language practitioners do
- the knowledge outlined for students in existing plain language programs
- the skills identified by experienced plain language practitioners.

3.5 How could we finance a training curriculum?

There is a second major reason for proceeding with the EQF to establish the best training for plain language: finance. Setting up a plain language training program requires money. Adopting the EQF also opens up the possibility of European funding.

In March 2010, Karine Nicolay and Jan Dekelver from K.H.Kempen (Belgium/Flanders) and Sandra Fisher-Martins from Português Claro (Portugal) visited Stockholm University, the Swedish Language Council (Språkrådet), Språkkonsult and the association for Swedish certified language consultants (ESS). This visit ended with the intention of applying for funding for plain language curriculum development from the European Erasmus Lifelong Learning program (LLP) (http://ec.europa.eu/education/lifelong-learning-programme/doc78_en.htm).

Partners

The organisations participating in this project include:

- K.H. Kempen as the required coordinating higher education institution (Belgium)
- Stockholm University (Sweden)
- Sigmund Freud University (Austria)
- Instituto Superior de Educação e Ciências (Portugal)
- Institute of Estonian Language (Estonia)
- Simon Fraser University (Canada)
- Association for Swedish Certified Language Consultants (Sweden)
- International Plain Language Working Group (international).

The course

The partners have opted to work on a one-year course on clear communication that each partner can adapt to its own local needs and possibilities. This may be a postgraduate course, a masters course, a course given by a private or public body, and so on.

The course will be open to students with a bachelor or masters degree (and in exceptional circumstances also for students with 'externally earned competences'). It will address language, design, policy, usability and

project management, with a special focus on plain communication in European institutions.

After the course, students will receive a European diploma in plain language and design. In the long run, this may also open a path to international professional certification.

Project method

The project could proceed by adopting the following approach.

Before the application:

- analyse the need for a plain language training program
- review the state-of-the-art in plain language best practice

During the project:

- define the learning outcomes (knowledge, skills, competencies)
- establish admissions criteria, processes and tests
- develop teaching, working and delivery methods
- develop learning materials
- develop ICT and blended learning
- prepare for the start of the course
- work on promotion, website, conferences, and so on
- study and establish recognition and awards system (following ECTS)
- provide quality control
- provide project management.

Working with plain language experts

The application will benefit considerably if we can demonstrate that the university partners are working with the recognised industry experts in the field—many of whom have impeccable academic credentials—to develop a ground-breaking curriculum for plain language. Without this, there is a danger that the training will be weighted towards theory more than practice and will not take sufficient account of real-world work situations.

One way to bring the plain language community into this process would be to form some kind of organisation, such as an institution that represents major plain language bodies internationally: PLAIN, Clarity and the Center for Plain Language.

To be a formal part of a European-funded project, the plain language community would need to create a European-based legal entity. The major plain language organisations could, for example, become the members of that entity for the purposes of securing funding and providing a conduit between the university sector and industry practitioners. The final chapter of this paper discusses options for the institutional structure in more detail.

Including some kind of organisation representing practitioners as part of the project would provide some quality control and a conduit for practitioners with expertise in particular areas to contribute to the curriculum development without having to do it voluntarily.

Above all, an LLP application is worth pursuing because it provides an opportunity to secure the resources needed to conduct the research and develop plain language courses. Without this funding, it is likely that training will continue on a more ad hoc basis, or be developed by universities without the input that industry practitioners should provide.

The application will be for €400,000, of which at most €300,000 can be funded by the EU. This means there will be a €100,000 co-financing from the partners. The deadline for the application is 26 February 2011. If approved, a two-year project can probably start in September 2011, with the first courses starting in September 2013.

The project was the subject of a panel discussion at the Clarity Conference in October 2010 in Lisbon and (if approved) there could be workshops on the training program at future plain language conferences in the next two years.

3.6 How could we extend the training to other countries?

While an EU-funded project is a practical way of developing plain language training at university level, the next challenge will be how to extend the training to countries outside Europe.

Here, there is a further advantage of working within the EU in that the course will already be developed for major languages and might

easily be adapted for other countries. The addition of Simon Fraser University in Canada as a partner will also help the project to assess its extension outside Europe.

Where universities in other countries do not take on the training, students from those countries may be able to attend plain language courses through a European university and perhaps seek supplementary training in their national language in their own country.

Alternatively, a country may be able to establish a professional association such as exists in Sweden to offer the training, or to work with universities who plan to do so. The emerging international institutional structure for plain language could support individual countries in establishing an association or in facilitating training.

High quality training resulting in a recognised qualification will be essential if we are to achieve more uniform standards for plain language practice and realise the benefits that it can bring to the community. This must start with filling the gaps in our knowledge and finding the finance to develop model courses for universities to offer. While the EU seems to offer the most immediate opportunities for doing so, there is no reason this cannot eventually extend throughout the world.

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Contributing to the journal

Clarity often focuses on a specific theme (like conferences or drafting or standards), but we also publish articles on a variety of other plain language topics. Please submit your articles to the editor in chief for consideration.

Would you like to be a guest editor? Our guest editors gather articles, work with the authors, make layout decisions, and edit and proofread a single issue. If you would like to guest edit an issue of the *Clarity* journal, send an email to the editor in chief.

Finally, if you have ideas about improving the journal, the editor would like to hear from you, as well. Our editor in chief is Professor Julie Clement, with the Thomas M. Cooley Law School. Email her at clementj@cooley.edu.

4. Grounding plain language in research

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Overview

Over the past few decades, plain language advocates and practitioners have become increasingly articulate about the principles of plain language. It is now widely recognised that there are benefits to grounding plain language action in research. In fact, failing to do so poses a risk of the field losing credibility. This chapter explores the state of plain language research and outlines various options for its future direction.

We characterise plain language research broadly by outlining the contributions of formal and informal research. We assume that both types of research are useful for plain language advocates and practitioners.

Currently, there is limited research conducted specifically with a plain language agenda in mind. However, there is a large corpus of studies from other disciplines that are relevant to plain language. This complex and multidisciplinary research base suffers from various problems, namely:

- being scattered and fragmented
- being biased to contexts of 'English-only' and developed countries
- lacking specificity and applicability.

Largely because of these problems, we are not yet in a position to identify the research gaps.

Recommendations

We suggest that we gather and synthesise research relevant to plain language, pointing to various options for doing so. Then we make this research available and useful to those who can benefit from it. Plain language practitioners and advocates will then be better positioned to identify those research questions that still need to be answered.

This, in turn, will allow the field to chart a course to promote new research. Two fundamental issues for promoting research are:

- finding ways to fund studies that are useful
- finding researchers interested in carrying out formal and informal studies.

We suggest that plain language advocates and practitioners investigate ways to collaborate with the academy. We conclude that a cooperative international body could play an important role in grounding plain language in research. This would serve to raise the status of the field and the credibility of its arguments.

4.1 Research and its usefulness

In thinking about research that can help to guide and support plain language activities, it is useful to distinguish formal from informal research.

Formal research

By 'formal research', we are referring to studies that explore an issue or phenomenon using either quantitative or qualitative methods in a systematic way that could be replicated by another researcher.

Formal research is distinguished by the care the researcher takes in making sure the study follows accepted professional standards for excellence in quantitative or qualitative inquiry in the domain. As such, readers expect to see a clear explication of what was done, how it was done, how many people were involved, how it was analysed, and the implications. How researchers explain their goals, methods, participant selection, along with the rigour they bring to the analysis and interpretation, are important benchmarks for a good formal study.

Readers' judgements of what constitutes 'good evidence ' in formal research are context-dependent, depending on their field. Because many in the field of plain language carry out our activities in technically and rhetorically sophisticated communities (such as law, medicine, engineering, finance, government), we need to appreciate the kinds of research that experts in those communities find persuasive. Similarly, a person trained in the humanities reading an article about writing research would bring different criteria to bear in judging quality than a person trained in human factors.

Key questions for most readers of research include, 'what have I learned?', 'how generalisable is the work?' and 'am I persuaded by the work?' If we want to use research to support our best case for plain language, we must recognise the kinds of evidence our listeners will likely embrace.

Informal research

By 'informal research' we are referring to studies that are much less stringent in how they are set up. Informal studies are generally smaller in scope (such as case studies) and more focused on getting data quickly, without the constraint of explaining how things were done. Researchers typically carry out informal studies opportunistically—seizing on any opportunity to collect data that will be meaningful to bear on the question they want to answer. Most usability studies and assessments of documents and websites are informal.

The goal of such studies is not to write about the findings or to prove anything general, but to put the data to use, such as in revising a document or a set of menu options. Of course, informal does not mean unplanned or sloppy. Often, informal studies are used to generate ideas and hypotheses for more formal studies.

Combining formal and informal research

Both formal and informal studies are useful for plain language advocates. Formal studies allow us to make educated guesses about what works and why. They allow us to make inferences about what may happen in similar contexts. Informal studies can give us rapid information about, for example, what's good or bad about a text or a website. They allow us to make quick judgements about problems of communication and serve as good starting points for a more rigorous inquiry.

Reflective practitioners in our field are eager to consume both formal and informal studies because they recognise the value of building a research basis for what they do. They want to understand how research can make their efforts in plain language more effective and credible.

4.2 The nature of plain language research

Stakeholders and uses for research

Ideally, our research agenda would be informed by the needs of the stakeholders for empirical work on plain language, with a focus on their likely uses for research. The following tables present some of the stakeholder groups and uses for plain language research.

Stakeholder groups
Advocates, practitioners
Academics, students
Citizens, readers, users
Consultants, trainers

Uses for plain language research
Recognise the social benefits of plain language
Measure the commercial benefits of plain language
Examine the feasibility of plain language programs in small and large organisations

Stakeholder groups	Uses for plain language research
Gatekeepers, decision makers	Assess the impact of plain language laws in promoting plain language and empowering citizens
Law-makers, regulators, legal drafters	Calculate the cost/benefit and return on investment of plain language programs in business and government
Managers, finance officers	Identify the visual and verbal features that tend to make texts difficult and create confusion
Journalists, bloggers, podcasters	Characterise the visual and verbal features that tend to make texts easy to comprehend and use
Writers, translators, web designers, corporate communicators	Understand how good readers and poor readers engage with texts and graphics
	Inform a global a standard for plain language

The limited research base within plain language

On the one hand, there is a limited corpus of formal or informal studies that were designed with a plain language agenda in mind. In addition, there are few literature reviews of the formal research that contributes to the field. For some examples, see the debate over the research on readability (Redish & Selzer, 1985; Schriver, 2001; Dubay, 2004). See also Felker and his colleagues (1981), who review the early research on document design, and the US Department of Health (1984), which reviews the early research on testing health communications.

There are reviews of the informal research that can also help us to understand plain language. For some examples, see Kimble (1996) and Schriver (1993), who examine a number of case studies that illustrate the financial benefits of plain language.

A wider research base from related disciplines

On the other hand, there is a great deal of existing research from other fields that can provide empirical evidence for decision making as we create content designed to be plain. There is general consensus in our community that the research we need to draw on must come from many fields—ranging from the arts, humanities, social sciences and communications-related areas, to business, law and finance.

Indeed, the study of plain language and information design is inherently interdisciplinary and draws productively from a variety of fields and subfields, as the table overleaf shows.

The usefulness of formal and informal research from other disciplines

Current research from formal studies of language, reading, psycholinguistics, graphics, and typography, for example, can contribute significantly to our understanding of both the nature of plain language and the visual/verbal text features that tend to be plain for most people.

The existing body of informal studies can also be very helpful to plain language advocates and practitioners. For example, usability studies can help us to gain perspective on how people engage with and use paper or online texts. These types of studies can help us choose among strategies for implementing plain language revisions and can help us isolate the characteristics of particular genres that make them plain for given populations of readers.

Research from fields such as those listed above can help us to understand plain language and test our assumptions about what works (see Felker et al., 1981, and Schriver, 1989, 1997 for the multidisciplinary efforts that helped define document design). Karen Schriver is also working on a synthesis of the current empirical research on how writing, design, and typography influence how people read print and online texts (Schriver, in preparation).

Arts, humanities and social sciences	Communications	Business, law and finance
Anthropology	Advertising & branding	Administration
Applied art	Content management	Business strategy
Cultural studies	Content strategy	Customer experience
Decision making	Customer service	Employee relations
Graphic design	Document design	Finance
Discourse analysis	Experience design	Financial services
Instructional design	Information architecture	Information technology
Gerontology studies	Information graphics	Innovation
Applied linguistics	Interface design	Legal writing
Philosophy and ethics	Multi-media & animation	Public policy
Cognitive and social psychology	Marketing	
Human factors	Second language acquisition	
Psycholinguistics	Translation	
Reading comprehension	Localisation	
Rhetoric & semiotics	Publishing and editing	
Semantics	User assistance	
Sociolinguistics	Usability	
Sociology	Web design	
Typography	Writing	
Writing & literacies	Writing for the web	

Limits of what we know

Existing research will not answer all our questions about how to make written communications plain. There are many unexplored and underexplored open questions. But existing research can give us insight into the evidence (or lack of it) for relying on our current repertoire of plain language principles, techniques, tips, guidelines, and best practices (Schriver, Cheek and Mercer, 2010). With a deeper knowledge of the available formal research, practitioners will be better positioned to move beyond intuition and to make claims based on data.

4.3 Issues with the existing research base

Some problems with the existing research

Scattered and fragmented

The main problem with the existing research is that it is scattered across many fields over a wide variety of publications—including books, journal articles, technical reports, websites, and conference proceedings. Moreover, because the standards for research excellence differ from field to field, and even from publication type to publication type, it is difficult to integrate what is known about a topic and feel confident about the inferences one can draw across studies.

Put differently, it is hard to make reliable and valid comparisons across studies when the studies are driven by radically different assumptions and goals—and when few studies are replicated.

English-only

Another quite different problem with the existing research is that it has been conducted mainly in English with native English speakers. Basic and applied research needs to be conducted with populations across many languages and cultures. It may be that some

issues of plain language are unique to particular countries and/or particular languages.

Bias toward studying developed countries

Most of the studies that impinge on plain language have been conducted studying populations in the United States, Canada, Australia or Europe. Countries in which plain language is needed the most may have little research base to draw on, largely because they do not have a history of funded research in the social sciences. This puts developing countries at a distinct disadvantage, especially throughout Africa, and illustrates a large gap in current research.

Lack of specificity and applicability

A problem with some existing research is that the authors are vague in describing the work and narrow in their selection of participants. In addition, the participants are disproportionately college-aged 'good' readers carrying out reading tasks because they were told to, rather than because they needed to.

As a consequence, we find few naturalistic studies in the existing literature. For example, there are few studies of average readers, poor readers, and non-readers engaging with documents for authentic purposes. Today's researchers more readily recognise problems of bias and are working toward changing the paradigm of studying 'convenience samples'.

4.4 Synthesising existing research

One of the results of the problems outlined above is that we cannot yet identify the gaps in the research. Synthesising the existing research would help us to identify important research questions and the gaps between what we know and what we want to find out.

We do not yet have a synthesis of the existing research that integrates the findings related to issues that concern plain language practitioners and advocates. This is not a new problem. There has not been a systematic review of the interdisciplinary literature that contributes to our field in over a decade. In fact, one could argue that it has never been done with an eye toward providing ideas for plain language advocates and practitioners. That said, there have been reviews of document design and web design that can serve as useful starting points (Felker et al, 1981; Koyani et al., 2004; Schriver, 1989, 1997; Redish, 2007).

Part of our future agenda should be to frame the crucial issues we seek answers to. Even though the task is hard (and a bit frustrating), plain language practitioners and advocates need to conduct original reviews of the interdisciplinary literature. We should take advantage of the many excellent studies that already exist. If we do not, we run the risk of reinventing the wheel.

To integrate the existing research from the perspective of a domain expert (for example, psycholinguists working on the cognition of sentences), we could take one or more of the following options:

Option 1: identify researchers to conduct literature reviews

This option would involve the following steps:

1. Identify researchers (or research organisations) whose work is relevant to our concerns.
2. Fund those researchers to carry out a literature review of their area(s), with an eye toward generating evidence-based guidelines.
3. Take that work (literature review, guidelines, and bibliography) and turn it into an easily searchable database for plain language advocates and practitioners around the world.

It is important to recognise that not just any 'literature review' will do. We need a review that is broad and deep, but also explicit in implications. To ensure the usability of the literature reviews we fund, our Request for Proposal needs to specify our requirements, such as a literature review, general findings, and evidence-based guidelines/principles. We should also set our goals on eventually funding proposals to study particular issues, such as what causes people to stop reading.

Option 2: wait for research to be published and then build on it

Alternatively, we could wait for relevant research to be published, and then build on that work ourselves. Although possible, this would be a difficult process. Clearly, we face a formidable challenge in integrating the existing research relevant to plain language.

4.5 Making research accessible and promoting new research

Making research accessible

We can make research more accessible by making it available and useful.

To make research more available, we can, for example:

- offer literature reviews available for download on the Web
- make research easily searchable—content tagging with keywords and synonyms
- enhance forums—get people who are not 'doing' plain language to discuss it
- create Wiki formats—consider new ways to draw 'everyday' people to research results
- set up conferences and networks (virtual and real)—host the best speakers on plain language to spread the word and write about plain language
- get into print publications—as often as we can and in as diverse publications as we can
- create newsletters, which could be global or local.

We can make research more useful to advocates and practitioners, many of whom do not have a background in research, by including ideas, case studies and recommendations on how practitioners and advocates can use the research in their work.

We would need a good website and a dedicated team prepared to make the research usable for the variety of plain language constituents, and a team to test the site to see if our intuitions about accessibility are on the mark.

By drawing on the talents of the Plain Language Association InterNational (PLAIN) forum, the Center for Plain Language, and members of Clarity, we could pool our collective talents to become a one-stop shop for plain language advocates and practitioners.

Accessible research would pave the way to identifying research questions. Once we archive the research that has been done, we could identify the questions that practitioners still need answers to and consider ways to promote new research.

Funding new research

We can also promote more good research by funding it. Funding is a serious question that needs international collaboration. But one thing we know is that if we could fund our own studies, we would have answers to many of the questions that concern us.

We can also try to promote new research by collaborating with members of the academy. Although not many academics have been interested in carrying out plain language research up to this point, it seems likely that as government agencies put more plain language laws into effect, interest will percolate, especially if funding for plain language projects becomes available. We can be cautiously optimistic.

We could inspire interest in research by putting together a framework on how to sponsor students or offer scholarships or internships in return for doing plain language research.

4.6 Role of an international institution

An international organisation could play a role in putting in place many of the initiatives referred to in this chapter. In a general sense, it could help educate its members about how empirical observation could be useful in everyday acts of plain language. It could play a central role for many of the initiatives we have described.

In synthesising existing research, an international institution could provide a cohesive vision of the plain language research that exists. It could also offer a framework for considering the 'big picture' of research. When the institution is firmly established, it could identify 'needed research', recommend research topics, make suggestions for replication studies, and sponsor original studies.

In making research more accessible, an international institution could serve as a clearing house for plain language issues from around the globe, such as through an online database of plain language publications on research and practice. It could also offer bite-size research capsules to release to the media.

In promoting more research, an international institution could initiate and organise funding programs.

Overall, an international plain language institution could be the catalyst for changing the

shape of the field around the globe. By grounding its activity in research, it could both raise the status of the field and the credibility of its arguments.

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Frances Gordon*'s career started far from the corporate environment, travelling rural South Africa to research and write educational materials for adult learning. This sparked an interest in clear, simple communications, which she began to apply in the corporate world in 1995.*

Her career includes tenures at Logical, a division of Datatec, as a communications strategist, and at London-based Siegel & Gale as a senior content strategist. Frances has worked on documents and websites for a wide range of blue-chip international companies.

Frances has written for various UK and South African publications and has spoken at conferences about the relationship between brand strategy, technology and simplification. In 2005, Frances and Candice Burt founded Simplified, a training and consultancy firm specialising in plain language.

5. Advocating plain language

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Simplificado Punto, Mexico

Overview

The dictionary defines 'to advocate' as meaning 'to argue for' or, more broadly, 'to support' a cause. To what extent can and should a plain language movement or profession do either of these? Certainly we do plenty of arguing for plain language. The question is what plain language institutions should do to support the cause.

The working group considers that advocacy remains vital if we are to strengthen plain language throughout the world. To realise the potential that plain language offers to the public, to the economy and to democracy, countries already engaged in plain language need to share their success with others that aspire to do so.

Every country that has introduced plain language benefited from early institutional support. In Sweden, this came through the Ministry of Justice. In the United Kingdom, the Plain English Campaign and the Plain Language Commission had a significant impact. In the United States, there was the Document Design Center and, more recently, the Center for Plain Language. In Australia, the Law Reform Commission of Victoria—since replaced by the Victorian Law Reform Commission—completed ground-breaking work.

What has worked at a national level is even more important at an international level. It has already proven invaluable for countries without plain language initiatives to learn from those where plain language has already been introduced. This chapter will use Mexico as an example to illustrate how much easier it is to persuade government or business at senior levels when we can show how other countries have accepted the case for change.

International advocacy could continue on the same basis as it does now, through ad hoc cooperation between national organisations and international bodies such as PLAIN and Clarity. But maximising advocacy may require a more structured approach in the future, which suggests scope for more formal institutional arrangements. This could be achieved through a loose federation of existing organisations or a formal new international institution.

Recommendation

The working group supports advocacy becoming a core part of any international plain language institution that might emerge following this options paper. The advocacy of any institution should be focused internationally, working closely with national bodies to provide the following kinds of support:

- engaging in direct lobbying of governments and industry
- providing information and resources for national organisations
- hosting or supporting international events and exchanges
- developing testimonies and case studies for use at a national level.

5.1 The need for international advocacy

As absurd as it may seem, language clarity is not a trivial matter in modern life. Over the centuries, humanity and—by no coincidence—governments have developed a ceremonial and complex language, at times to distinguish those in upper levels of the social hierarchy. Today in the 21st century, governments and private institutions are still influenced by this communications paradigm.

The natural consequences of this present a high cost to society: for governments, loss of confidence in their public management; for companies, the loss of business. Yet transparency and accountability are central pillars of both democracy and economic efficiency.

Defending plain language is not a romantic idea or a passing fad, but a permanent cultural and paradigm shift. It means struggling against scepticism, resistance to change, and persuading politicians who prefer monumental projects with high political value to the small details that distinguish a civilised and educated society.

International experience has shown there is no exact formula for implementing a plain language initiative. There have been initiatives begun by organisations working outside government and business. In other cases, governments adopted internal models either top-down or bottom-up.

Similarly, plain language is often linked to social groups who may require very different strategies, including:

- societies with different indigenous groups or multilingual groups
- societies with ethnic groups with different beliefs and customs
- government bureaucracies at national, state and local levels
- legal systems
- technical and scientific fields.

For years, the most industrialised countries, along with a number of developing countries, have been discussing administrative modernisation as a means of strengthening democracy. The challenges each country faces are varied, but they have three things in common:

- improving citizens' confidence in government, business, and the law
- improving services and quality of life
- improving efficiency and reducing public debt, and reducing costs to business.

Each country sets out its own priorities, and each also seeks the best tools and practices for its needs. In doing so, they are aware they are not alone—the great majority are affiliated with international organisations that encourage the exchange of best practice. This is the case whether it be reducing bureaucracy, optimising budgets, restructuring or simplifying procedures and processes.

Countries such as Sweden, Australia, the United Kingdom, the United States and Canada have, for around 30 years, been exploring and developing a range of strategies applied to clear communications in a number of fields. They have succeeded in creating awareness in the public sector and, in many cases, in the management of private institutions. They have produced concrete examples of clarity in language and demonstrated its social benefits.

These advances mean that conditions exist for setting out a road map and international standards for language clarity initiatives to be adopted by new countries, improved on by countries already working on the issue, and perfected by the countries that have made the most advances.

For example, the support Mexico has received from these countries and international organisations meant that in 2004, the initiative known as 'Lenguaje Ciudadano' (Citizen Language) was implemented successfully. Undoubtedly, the enthusiasm of Sweden, the United States, Australia, the United Kingdom and, in particular, the Spanish Academy, was not only a source of inspiration, but a shortcut to advancing a couple of decades research into, and learning about, best practice.

But the struggle for plain language is by no means over, even in countries that have more advanced programs. As the recent lobbying for plain language laws at the federal level in the United States shows, advocacy can still produce major initiatives that will further strengthen the reform of public language.

5.2 Scope for advocacy by an international institution

While it is easy to observe the past successes and the potential for plain language advocacy, the next step is to consider the best way to promote plain language internationally in the future.

We argue that strengthening plain language around the globe will require further international cooperative action, and that suggests developing a more conscious institutional structure. The final section of this chapter

discusses the institutional options for coordinated international action. The rest of this chapter will refer only to the role of an 'international institution' in advocating for plain language.

While we feel that some kind of institutional structure is necessary to maximise the impact of advocacy, the plain language community will need to decide whether that structure is:

- a loose but co-ordinated network
- a federation of existing bodies
- an entirely new organisation.

Advocacy should be one of the main considerations in selecting the right institutional model. Advocacy should then become a core part of whatever institution emerges.

International advocacy

Whatever institutional vehicle emerges, the focus of its advocacy should be directed at international rather than national action, although it will inevitably need to work closely with national bodies.

Administrative changes in both public and private sectors tend to be traumatic and are frequently radical. In Mexico, for example, every six years there is a change of president and state governors, and every three years a change of local government, which unfortunately leads to a struggle for continuity in public policies. To combat this, formulas for a smooth transition and continuity must be found.

An international institution could play a strategic role in this context to defend plain language:

- as a decisive factor in building democracy
- as a central pillar of transparency and accountability that works against corruption
- as helping combat the manipulative practices of authorities
- as helping reduce arbitrariness by authorities and bolstering trust among citizens
- as reinforcing citizens' right to understand the workings of government, allowing them to better fulfil commitments and responsibilities
- as reducing costs of transactions for institutions and citizens.

An international institution would also:

- remind new administrative regimes of plain language initiatives
- support societies in defending the use of plain, simple and direct language in institutional and individual relationships
- organise international events such as conferences to bolster international exchange of best practice and innovation
- encourage organisation and integration of more countries to support and extend plain language worldwide.

A new international institution should become an international lobbyist, pushing for plain language in bodies such as the UN, or setting up international standards or conventions. It may also organise or support direct activities such as international conferences as a means of promoting international action for plain language.

Support for national organisations

However, any new international institution should not compete with or seek to supplant organisations working within a particular national sphere. So there would be no push to compete with the advocacy of the Center for Plain Language (United States) or Plain English Power (New Zealand). Here, the international organisation would play a supporting role, putting its name behind the national efforts in a particular country, but be guided by that country.

The most useful thing that the international body could do is to encourage and support national plain language organisations to become established in as many countries as possible. It could provide a network, models and perhaps resources for budding plain language efforts. In this way, it would be meeting its international charter to advocate by extending plain language, but without having to run these things itself. It could achieve this whether as a formally constituted organisation or a more informal network.

As the institutional foundation of plain language develops throughout the world, the new international institution can also act as a catalyst to bring all national organisations together for joint action.

5.3 Areas of activity for international advocacy

Direct lobbying

When a country identifies the need to strengthen clarity in its communications, at least three sets of interested parties must be identified to lobby for plain language:

1. Those whose responsibility is to improve administrative practices in a country.
2. Sceptics or conservatives who are reluctant to accept paradigm change under the pretext that technical or professional language cannot be interfered with.
3. Champions of change whose enthusiasm can transform language use, and who see clarity as a means of achieving better results in managing institutions.

Advocates can help these groups to identify specific objectives, benefits to be achieved, quick advances, impacts and contributions.

Support for lobbying by other individuals and organisations

Apart from direct involvement in lobbying for clear communication in a particular country, an international plain language institution could also support key individuals and local organisations who are already lobbying. At times, the authority of an international body will be influential. At other times, change will require opinion leaders who enjoy prestige and recognition in their own society and institutions.

Extraordinary as it may seem, while people are generally aware of the lack of clarity with which governments and corporations deal with society, it is like the hum generated by a broken air conditioning unit—you can hear it all the time but no-one complains because it forms part of ambient noise. People adapt and learn how to get along with it without paying it any attention. It is only when the unit breaks altogether or is turned off that people notice the difference and realise how annoying the sound really is.

The same thing happens with vague, confusing language: as long as no-one concerns themselves with it, society adapts. But when an initiative on language clarity emerges, the need to implement it is quickly realised. In the case of Mexico, when the need for clarity in language was identified, defenders and supporters of the initiative appeared, along with institutions prepared to join the cause.

International advocacy then becomes important to provide models for action in individual countries, such as:

- academic involvement to validate the benefits of plain language. This may range from constructive criticism to the development of academic programs to train experts (especially linguists, and lawyers).
- the creation of not-for-profit citizens' networks that, due to the quality and prestige of their members, are respected and recognised by their society. In the case of Mexico, the Plain Language Network is made up of academics, experts in institutional communication, opinion formers, Transparencia Mexicana, representatives of business forums and government employees in positions to transform institutional methods.
- the establishment of acknowledgement programs and incentives for those who promote the use of clarity in language. Examples include the Plain Swedish Crystal in Sweden, and the Citizen Language Recognition in Mexico, among others.

Providing information and resources to promote plain language

There is no doubt that the political will expressed by a government or a company must be seen in the budget, structure and the payroll. There may well be an interest in plain language, but the first problem faced by enthusiasts is to justify and explain the budgets and resources required to begin a plain language initiative. So one of the first jobs of international advocates is to help developing countries to identify the need and to offer them persuasive information and guidance.

An international plain language institution could help guide other countries in identifying international funding sources to support an emerging plain language program. In the case of Mexico, American USAID, the British Council and the British Embassy, the Swedish Embassy and the Spanish Agency for International Cooperation for Development (AECID) were critical in implementing the Citizen Language initiative. Without the information and resources provided by such

organisations, an isolated initiative is less likely to reach its potential.

A new institution could also play a role in:

- promoting the exchange of experts' experiences in the field
- helping develop materials, methods and content
- training and educating experts in the field who can duplicate experiences within a government or institution
- sponsoring and promoting study trips and international exchanges that allow full immersion in the subject
- facilitating consultancy and peer reviewing between member countries
- encouraging countries to join and participate in international organisations and committees working for language clarity to maintain up-to-date knowledge, exchange new methodologies and innovative ideas
- establishing standards that recognise advances in citizens' language
- creating internet resources, references and news about national and international events.

Organising and hosting activities that promote plain language

As the saying goes, 'prophets have no honour in their own country', which is why external involvement with a government can help bring about a solid foundation for plain language. Following are some of the activities that an international institution could support in helping a country establish a plain language initiative.

Launching an initiative

The launch of plain language program in a country could bring together people potentially interested in plain language, focusing on those in decision-making positions with the power to persuade others in offices and official bodies. This could begin with an open invitation to:

- civil servants from the country's various ministries and bodies
- representatives of the academy
- communications professionals
- other opinion leaders.

The highest levels of government should be invited to these meetings, along with:

- the authorities whose job it is to approve the project
- ambassadors and legal representatives from the home countries of the international speakers and experts
- the media, including newspapers, TV and radio and expert speakers in the field.

An initiative of this kind would highlight the issue in a particular country, generate some support, build contacts and identify areas of opportunity.

If there is any lesson to be drawn from the development of plain language in other countries, it is that a handful of people using the media effectively can have an enormous influence. A strong example would be the symbolic shredding of government forms in London in 1979, which boosted the influence of the Plain English Campaign and direct government action in simplifying a range of forms. This also generated a taste in the media for plain language as a regular story, and in turn a public awareness of the need for change.

An international plain language institution could help a growing range of countries to mount similar start-up initiatives.

Focused events

After helping to launch a plain language program, an international institution could also help with lobbying of specific groups of allies or potential opponents. The outcomes may not be those expected, nor the optimum ones, but they do represent the start of an awareness campaign for those who question the paradigm shift.

Roundtable discussions with experts

Participants in roundtable events should comprise a range of specialists in linguistics, public policy, experts in different areas and international consultants, as well as representatives from the private sector in a position to lobby the government.

This kind of meeting could help develop principles, standards and tools to help integrate and apply plain language in government and other contexts.

Workshops

Workshops would be aimed at people who are directly involved in producing documents and communications. Here, international organisations can assist by providing materials and teaching methods, whether by direct or distance learning.

In Mexico's case, the first workshop involved experts from the United States, the United Kingdom and Spain, as well as Mexican leaders in communications. These workshops did not seek to produce experts in plain language, but introduced the field to awaken an interest in the subject and encourage participants to put it into practice.

Five years on, the workshops proved an effective way of identifying agents for change and reaching the sceptics. But workshops have a limited capacity, making this a slow method. Over this period, the Mexican government was able to train around 5,000 civil servants from a total of some 65,000 career employees.

Distance-learning programs, on the other hand, have an astonishing capacity for promotion and growth. For example, the Mexican Treasury Department (SAT), in charge of fiscal matters and tax collection, managed to train over 33,000 employees through this method.

Conferences and talks

Positioning and defending an initiative like plain language means arranging regular conferences and talks for multidisciplinary groups and organisations. These forums demand convincing content based on facts and results obtained from experience in other countries to highlight the benefits of implementing plain language.

Testimony of the benefits and results

There is no better way to persuade the institutions and employees of any government or private company than testimonies, facts and results. This is because those who narrate their own experiences have passed through the most complex stages in implementing clear language policy, and as such are the best representatives to voice plain language initiatives.

Effective testimonies generate credibility and overcome the scepticism and fear of changing the paradigms of communication. This is especially true if these testimonies come from administrative institutions or bodies that usually follow rigid, inaccessible or even incomprehensible policies, such as those in charge of tax collection, attorneys in charge of litigation, or any body in charge of technical operations.

Facts and experiences are a key agent for change, since they broaden the vision of those in charge of setting up and implementing a plain language initiative. Facts make up a varied mosaic of possible applications and goals that such a strategy can attain. Such facts range from rethinking a letter for mass public distribution, a customs form, a baggage reclaim form, a regulation, a legal sentence, or even a law or international treaty.

Measuring results demonstrates the before and after transformation of communication. Every sustainable public policy must be based on measurement of its results, which may be quantitative in economic terms or qualitative in the public perception of the quality of a service.

In Mexico, for example, the institution in charge of tax collection undertook a pilot project in one area to rewrite their letters to taxpayers who lag behind with their contributions, using a simple and clear citizen language. The results showed an increase in collection of 18 per cent and a reduction in clarifications from 33 per cent to just three per cent. An international plain language institution would have a vital role in collecting this information and using it to advocate for broader change.

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6. Certifying plain language

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Overview

This document sets out some options for certification of plain language practitioners. It will help the plain language community to make some informed decisions about any next steps in what is one of the more contentious areas that this paper discusses.

Certification is arguably an important step towards professionalising plain language, and has benefits for practitioners, employers and the public. For practitioners, certification can raise professional status and differentiate them from related disciplines. For employers, it's a guarantee that the practitioner has the skills needed to perform a job. For the public, it's a protection and an assurance of professional conduct, accountability and quality of service. Of these three, the benefits for the public are the most important justification for certification.

But certification is also a difficult step that needs to be managed carefully. Deciding on whether to certify plain language practitioners and how to go about doing it is a long-term project. Sound foundations must be laid before we make any progress: a definition and standards for plain language, a clearer understanding of what plain language practitioners do and the skills and knowledge required to do it.

We also need to look closely at the risks involved. The most obvious is the damage to the profession's credibility if certified professionals fail to provide the expected level of service. There might also be disputes between practitioners and the certifying agency. These are only some of the questions to answer as we move onto the next stage.

To address these issues, our initial view is that any certification scheme should be voluntary and focus not on what training people have, but on their competence and their ability to do a defined job. And we should learn from the experience of other associations and disciplines that have dealt with the risks. The plain language community could then develop an appropriate standard with expert help from a standard-developing organisation so it could apply to practitioners in any country.

Certification may take more than a decade to achieve. This would place it among the last of the options discussed in this paper. However, to achieve even this timeframe would mean starting now.

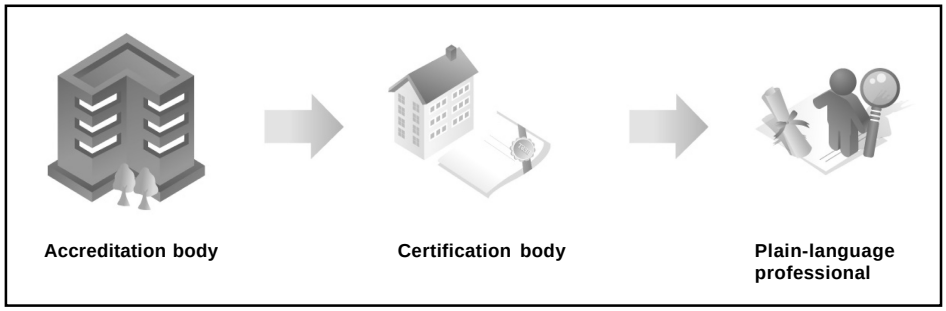
Recommendation

We recommend exploring the possibility of certifying plain language practitioners against a standard for professional knowledge, skills and practice. The first step should be to form a Professional Standards Committee to oversee the research and the practical steps involved.

6.1 Clarifying the terms 'certification' and 'accreditation'

To begin, we need to clarify what we mean by two terms that are commonly confused: certification and accreditation.

Certification attests that a product, service, system or professional complies with a standard. For professionals, it's a way of showing clients or potential employers that their experience and skills have been assessed by an independent, unbiased authority that considered them competent in their field. Certification can be compulsory, such as for regulated professions like doctors and airline pilots, or voluntary.



Some plain language practitioners argue that certification should not be pursued as an end in itself, but as a means to improve the services that practitioners and employers provide to the public.

Accreditation recognises an organisation's competence to assess whether a person, a product, a service or a system complies with a standard. Accreditation is normally voluntary and issued by accreditation bodies such as the Standards Council of Canada, Portuguese Institute for Accreditation, Swedish Board for Accreditation and Conformity Assessment, and the United Kingdom Accreditation Service.

In this chapter of the options paper, we'll focus on the certification of plain language professionals. We'll also briefly discuss the possibility of a certifying body or bodies becoming formally accredited.

6.2 The benefits and risks of certification

The benefits

Three broad groups will potentially benefit from certification:

- practitioners
- employers
- the public.

For practitioners, certification can raise professional status and differentiate them from competitors in closely related fields. For employers, it's a guarantee that the practitioner has the skills needed to perform a job. For the public, it's a protection and an assurance of professional conduct, accountability and quality of service.

Certification is often seen as one of a number of necessary steps towards professionalisation. In Sweden, the only country with a three-year university diploma in language consultancy, most government agencies will only hire certified professionals. They do so in the belief that a certified professional maximises the quality of the work they need and the benefits that this delivers to the public.

The working group agrees with this view. Certification is worth pursuing ultimately because of its potential to improve the quality of public communications by recognising and strengthening the skills of the practitioners that work to improve them.

The pressure of legislation

In recent years, successful advocacy for plain language has led to a number of laws that are beginning to mandate plain language for documents that have a social impact, such as in credit, finance and government. The consumer protection laws in South Africa and the Plain Writing Act in the United States are the best recent examples.

Inevitably, when a state mandates particular actions through statute, there follow questions of how to measure those actions. This generates a market for services that can assess and attest to compliance. While the laws contain definitions and some guidelines, inevitably organisations seeking to comply will want to turn to professional help. Already in South Africa, the laws have generated new communications practitioners promoting themselves in this emergent market.

The risk to plain language is that not all of the practitioners entering this growing market will be fully proficient. And without some form of certification to assess their abilities, they may conduct sub-standard work in the name of plain language that damages the credibility of all plain language practitioners. This would also reduce the benefits plain language could bring to the public because of the new laws.

A major benefit of certification would therefore be to maximise the impact of plain language laws by providing a structured and credible process for assessing the practitioners who would help organisations to implement them.

The risks

While the benefits of certification appear obvious, it also opens up, as one member put it, 'a can of worms'. The risks it poses include:

- potential and costly disputes
- low or uneven rates of participation
- litigation over poor work by a certified practitioner
- consumption of limited resources.

Disputes among practitioners

One of the major concerns is that practitioners might disagree with the criteria used or dispute any judgement made about their own proficiency. This risks opening up the field to legal processes that it can ill afford. Public coverage of any such dispute could damage the field overall and achieve the opposite of the intended outcomes.

Some practitioners may object in principle to having to 'prove themselves' and refuse to participate in a certification scheme, which would render it pointless. Senior practitioners, for example, may feel they have a sufficiently established reputation not to need certification. More junior practitioners, on the other hand, could see certification as a path toward professional recognition and be eager to participate. The initial balance of certified practitioners may therefore be skewed toward the middle ranks of the discipline.

To minimise these objections and potential outcomes, the plain language community must be involved from the beginning in defining the certification criteria and process. This also means that senior practitioners should oversee the process through established organisations such as PLAIN and through any new institutional structure they agree to. We will need to consult regularly and move ahead cautiously.

Since compulsory certification could meet with serious resistance (and would require state regulation) it would be preferable if any certification were voluntary. Whatever institutional structure administers it, it would work to build practitioners' acceptance and participation rather than force them to comply.

Potential for litigation

The next general risk is the damage to the nascent profession's credibility if certified practitioners fail to provide the expected level of service. This may also open up the certifying body to claims that an organisation had relied on a practitioner's certification and ought to receive compensation from that body because a service delivered was below standard.

Many professional associations have dealt with this by putting in place processes for dealing with complaints against certified professionals who break their standards of conduct, along with mechanisms such as professional indemnity insurance. So while these are all barriers to certification, the experience of other professions shows they are surmountable.

Prioritising our resources

Another concern expressed about certification is the energy and resources that it may take. Some argue that for the benefits that it brings, we can ill afford the time of the limited number of practitioners around the world who would need to set up a scheme. They argue that our resources are better directed at more readily achievable measures, such as establishing a definition, furthering advocacy and developing research and training.

This is understandable, but it implies that the key question is when, rather than if, we achieve certification. Certification may take some time, but the working group recommends it is worth pursuing to achieve the benefits it offers for our public language. We should proceed cautiously as our resources permit.

6.3 What could we certify and how?

Certifying people or organisations

The first question to tackle is what exactly would we certify? Certifying people is the obvious option if the goal is professionalisation. However, we could also consider certifying services. Instead of assuring that a person has the necessary skills to perform a certain function, certification would assure that a person or more likely a company can provide a certain service—that they have developed a

process or method that allows them to respond to a need in a way that produces the expected results.

For companies, it might be preferable to certify their services and not just the people who provide them. This would allow for continuity when staff leave and show they've developed processes that don't depend on individuals. Practitioners, even if self-employed, will almost certainly favour professional certification, as service certification tends to be a complex process with costs that might exceed its benefits.

We think both forms of certification could be considered, as they are complementary. For instance, a company could certify its services and employ certified professionals. However, we realise that certifying services would require a lot more administration and greater efforts to monitor. We suggest focusing our initial efforts on creating a framework for certifying professionals and later, depending on demand, think about service certification.

Methods for certifying practitioners

We will examine two ways of certifying plain language practitioners:

- certification following a training program
- certification against an industry standard.

The Swedish case: automatic certification following a training program

At the moment, the only certified plain language practitioners are the Swedish language consultants. Swedish certification is a three step process:

- complex entrance test (only six per cent of the applicants pass the test)
- three years of training
- a final exam, which gives you a diploma.

The diploma is the certificate and the university provides the certification.

End-of-course certification vs professional certification

This 'automatic certification' following an end-of-course, curriculum-based examination differs from a professional certification. By passing a final exam, the candidates show they've achieved the learning objectives. In a professional certification process, in which candidates are assessed against a formal standard, the question is not 'what do they know?', but rather 'can they do the job?'.

Professional certification assessments are based on a professional role delineation or job analysis. To get a certificate, candidates must prove that they have the knowledge and skills required to perform a specific task.

In addition, professional certification assessments should meet rigorous psychometric criteria, which means they should be a valid and reliable way to measure the candidate's competence.

Standard-based certification: assessing practitioners against a professional standard

Plain language professionals have different backgrounds in education and experience but have common skills that allow them to perform certain functions. Assessing them against a standard for professional knowledge, skills and practice is probably the fairest and least controversial road to certification.

6.4 Standard-based certification

Developing a professional standard

The first step towards a standard-based certification will be developing a professional certification standard. The first question this raises is whether this should be an international or national standard.

Some countries have been using plain language for decades while others are just starting to embrace it, so it is natural that job descriptions vary significantly. National standards could focus on local needs and recognise knowledge or skills that are valuable only locally, but would be difficult to implement. Each country would have to develop its criteria for certification and create an agency to assess professionals. This would be expensive and not viable for those countries with just a few practitioners.

An international standard could be developed by a central certifying body and applied locally by certifying agencies or directly by the central body. This certification could be transferable, allowing the practitioner to work in other countries. We recommend that, in the same way we might define standards for plain language that apply internationally, our standard for certifying plain language

professionals should apply to practitioners in any country.

The second question is whether to have a single standard or a range of specialist standards. Plain language practitioners have different roles. Some are trainers, some are writers, and some are editors. Should the certification standard reflect these specialisations or focus on common skills?

Due to the costs of developing standards, we recommend starting with a general certification and later, depending on demand, developing standards to certify plain language trainers, writers, editors, legal drafters, and so on.

Finally, there is the question of who will develop the standard. A professional certification standard could be developed with input from:

- the plain language community with input from all stakeholders
- the International Organization for Standardization (ISO)
- a standard-developing organisation (SDO)
- the university sector.

Developing a standard is a complex and lengthy process. We believe the plain language community must be involved but should seek help from experts.

The ISO is one of the first options that come to mind. However, the ISO focuses on international standards with wide application and its process may be unnecessarily complex and expensive for our purposes.

The other option would be to use the services of an accredited SDO. Funding permitting, this would be our recommendation, as their expertise would ensure that all parties are heard and the final result is as consensual and applicable as possible. However, we must make sure the SDO helps us develop the standard in a consulting capacity and that the standard remains the property of the appropriate plain language organisation.

Another question would be the potential role of universities in developing the standard. Clearly, any standard should align with future training developed at universities for plain language practitioners. The options paper chapter on training discusses a project for developing a curriculum in Europe for plain language at university level. If we proceed with standard-based certification, the completion of a university course would not automatically give practitioners certification. But it makes sense that the professional standard meshes closely with any curricula developed for plain language practitioners.

Assessing practitioners against this standard

With the standard created, we enter a second phase with a new set of questions.

Firstly, how will practitioners be assessed? The assessment must be fair, credible, reliable and valid. It will have to measure what it is supposed to measure—the ability to perform a specific job. Given the complexity and importance of the task, we recommend getting professional help to design the assessment method and instruments.

Next, who will assess practitioners? Should they be assessed centrally or locally? The existing international association, PLAIN, or any new organisation such as an institute or federation, could assess and certify practitioners.

The other option would be to have national certifying agencies that would localise the international certification criteria and test practitioners in their own language. At the moment, only Sweden has an agency—the Association of Swedish Language Consultants—that is involved in certification.

We recommend a mixed solution: practitioners should be assessed locally in countries that already have a certifying agency (such as Sweden) or have a sufficient number of practitioners to warrant setting up an agency. The certification would be issued centrally, such as by PLAIN or by a new body. When local agencies are not available, practitioners could be assessed by the central certification body.

Finally, who will be assessed? We feel that certification should be voluntary. Practitioners should be free to seek it, if they feel they could benefit from it, or to leave it.

We expect the certification process to cause some controversy. On the one hand, there is the 'experienced practitioners' vs 'newcomers' issue. Should we consider different certification processes for newcomers and experts? Should an experienced practitioner be able to get certified by presenting a portfolio and a newcomer by sitting an exam?

We believe so, as long as the different forms of assessing them are psychometrically equivalent and none of the candidates is put at disadvantage for choosing one over the other. On the other hand, we have those that receive formal training and, through an end-of-course examination, become 'certified'. At the moment, that's only happening in Sweden, but with more training programs in the pipeline, more people could find themselves in this situation.

We're aware that suggesting already-certified professionals go through a certification process would be unwise. For such cases, we recommend a transition phase, in which their existing certification would be automatically recognised by the certifying body. After the transition phase, any courses claiming to train certified plain language professionals would have to include a certification process recognised by the international certifying body.

Finally, there is the question of whether to have a one-off certification or a renewal system. Professional certification is usually time-limited. By getting re-certified every few years, practitioners show their commitment to lifelong learning and continuing education.

Becoming an accredited certification body

In a third phase, the certifying body or bodies (if the certification is done locally) might seek accreditation as a way of showing its competence in assessing a professional's compliance with the standard. Accreditation, which is voluntary but costly and time-consuming, would be granted by the national accreditation body of the country where the certifying body is based.

There are two main reasons for a certification organisation to seek accreditation:

- to differentiate itself from its competitors
- to respond to a market demand for certifications issued by accredited organisations.

None of these apply to our situation. First, our professional community is too small to attract other organisations offering competing certification schemes. Second, the market for plain language services is not at the point where customers expect professionals to have an accredited certification.

Additionally, it is unclear whether a national accreditation would be valid in other countries. This means that a centralised accredited certification body could certify practitioners internationally, but these certifications might not be considered accredited in their countries. If so, the investment in accreditation would only benefit local professionals.

In our opinion, accreditation is not a priority.

6.5 What are similar professions doing?

To help us assess the options for certification, we looked at the certifications offered by three professional associations: the Editors' Association of Canada (EAC), the Institute for Professional Editors (IPEd) in Australia, and the Society for Technical Communication (STC). The EAC's and IPEd's certification is standard-based, while STC is still developing its process. We also looked at the investigation of the Usability Professionals Association into certification.

Editors' associations: test-based certification

The Editors' Association of Canada offers four certification tests based on its Professional Editorial Standards, which set out the skills and knowledge editors need to do their job. Candidates can earn certifications in proofreading, copy editing, structural editing, and stylistic editing. By completing the four tests, they become a Certified Professional Editor.

According to the EAC, 'there are no formal requirements for taking the certification tests. However, the EAC Certification Steering Committee recommends candidates have at least five years of editing experience before taking the tests and that they prepare well'.

The EAC publishes certification study guides and a workbook with practice tests. It also provides seminars to help candidates prepare for the exams.

In Australia, the state-based editors' societies have joined together to form a national certification body called the Institute of Professional Editors (IPEd). This offers test-based accreditation of editors supervised by an Accreditation Board working to the benchmark of *Australian Standards for Editing Practice*.

Certified editors demonstrate their professional competence and understanding of editing standards, skills and knowledge by passing the IPEd accreditation exam. Certified editors can then use the postnominal AE (Australian Editor). Their certification is valid for five years, and renewal requires AEs to provide evidence of their continuing involvement in the profession and their participation in professional development.

The Australian certification scheme was the result of 10 years of planning and consultation. IPEd's forerunner, the Council of Australian Societies of Editors, set up the Accreditation Working Group in 2001 to research assessment schemes. IPEd established the Accreditation Board in 2005 to act on the working group's recommendations. The Board has held responsibility for developing and implementing the scheme since then, and introduced the first exam in October 2008.

Society for Technical Communication: portfolio-based certification

The STC is currently developing a certification program for technical communicators, which 'will be based on assessing portfolios and work artifacts, not examinations'.

According to the STC, 'practitioners will become certified in six core competency areas:

- User analysis
- Document design
- Project management
- Authoring (content creation)
- Delivery
- Quality assurance.'

The certification will be valid for three years. Re-certification will involve participating in educational and professional activities.

In the future, as it expands its 'Body of Knowledge', the STC might offer an exam-based certification.

Usability Professionals Association

In 2002, the Usability Professionals Association investigated the need for a certification program for usability professionals. Based on feedback from members and other professionals, the UPA Board of Directors decided that it was then premature for UPA to develop a certification program. A report on the UPA website stated:

> However, this work also produced a strong consensus on related initiatives that would provide immediate value for the profession. Among these is developing a body of knowledge to help usability practitioners grow professionally and help others understand usability better. A body of knowledge might include:
>
> - a list of skills
> - prerequisite knowledge
> - framework of usability life-cycle practices.
>
> This body of knowledge could then be used as the basis for a professional development plan, curriculum and self-assessment tools. The UPA is planning to move these initiatives forward.
>
> This work could also provide input to any future efforts to create a certification program. The UPA remains open to participating with other non-profit organisations in such an effort.

This supports the notion that plain language could proceed firstly by mapping the professional knowledge, skills and practice of practitioners in our field.

6.6 The next step: a Professional Standards Committee

The many questions highlighted in this paper require further research. While we have mapped out some major issues and options, working through these will take some time.

We suggest putting together a Professional Standards Committee to carry out this work. The Committee could further explore the pros and cons of certification, the different methods of certification and the implications of launching a certification project.

The structure of the committee will depend on the overall institutional structure that emerges from the international working group process. It could remain under the auspices of the working group, or perhaps become part of any new federated body or institute. Or it could be taken up by an existing organisation such as PLAIN.

The pace of development will need to be judged against the priority of completing

other work outlined in this options paper. But since certification will take time to achieve, we believe that the first cautious steps should be taken now.

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Sandra is particularly interested in the use of plain language and information design in public documents as a way of helping citizens make informed choices about their health, education, welfare, and civil rights. Her clients include the Government, Inland Revenue, Social Security, Caixa (Portugal's largest bank) and ZON (telecommunications).

Sandra is the Portuguese representative for Clarity. She is a member of the board of PLAIN and of the International Plain Language Working Group.

Member and other news and events

Clarity Breakfast in London on Tuesday 29 March, 8am

The next breakfast meeting will be held in the City Marketing Suite at the Guildhall. To find it, use entrance G on the map at www.clarity-international.net/Conferences/conferences.htm (thanks to Clarity member Paul Double). Please email Daphne Perry at daphne.perry@clarify now.co.uk to reserve a place. The subject is 'Plain English in a City law firm.'

The International Language and Law Association will be holding several conferences this year:

May 5-8: The Letter of the Law, Athens, Greece

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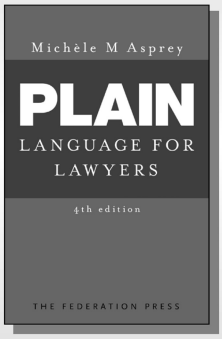

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7. Strengthening plain language institutions

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Overview

Before we can decide which of the many activities in this options paper we might pursue, we must discuss an inevitable difficulty: exactly who will coordinate and fund this effort? What role will existing organisations play and what new institutional structures might we need?

This chapter starts by assessing four options for the institutional structure of plain language:

- Option 1: working solely through existing organisations
- Option 2: continuing informal cooperation between existing organisations (the status quo)
- Option 3: formalising an international federation of existing organisations
- Option 4: establishing a new, comprehensive international plain language body

At one end of this spectrum, there would be no change to current arrangements, and it would be left to organisations such as PLAIN or Clarity to decide whether they will pursue the options in this paper. This maximises existing resources and offers the path of least resistance, but it may also restrict international coordination.

At the other end of the spectrum, we could establish a completely new international body with a wide ranging brief to implement the preferred options that emerge from this process. Some practitioners are concerned that the practical barriers to this approach are too formidable at this time, and that we should explore less formal mechanisms to coordinate our efforts. A new organisation may compete for valuable resources.

In between these two options are continued informal cooperation or a more formal federation of existing bodies. The International Plain Language Working Group is an example of informal cooperation, and the simplest response would be for this to continue. This would satisfy the caution of some practitioners and provide the flexibility to start with easier activities while we decide whether to develop a more complex institution. The chief disadvantage is that without a formal legal entity, we would not be able to apply for funding to achieve many of the options we might agree to, which would slow progress.

The next step would be to formalise international cooperation by establishing a 'federation' as a legal entity, with members who are already working through the International Plain Language Working Group: PLAIN, Clarity and the Center for Plain Language. This continues international cooperation but adds the capacity to apply for funding from bodies such as the European Union. This would extend the resources available to realise the economic and public benefits of plain language more quickly than current resources permit.

Recommendation

We recommend working toward option 3, a formal federation of existing organisations through a constituted body that has sufficient legal status to apply to relevant bodies for funding. This would formalise the existing arrangements of the International Plain Language Working Group by one further step. The fallback would be to continue international cooperation by maintaining the working group.

This chapter discusses the four institutional options in more detail, along with the spheres that any international federation should operate in, the legal structure and governance it might need, and possible memberships and funding options.

Recommendations

We recommend:

- the activities of any international institution should be focused internationally, working closely with national bodies rather than replicating their work.
- if the plain language community adopts option 3, the working group should canvass international interest in establishing the institution within a specific country. The group can then assess the best legal status, organisational structure and name.
- an international institution under option 3 should have a small organisational membership at the outset, but consider provision for expanded membership in the future.
- the institution should initially seek funding from public and private bodies rather than membership fees and services, but consider broadening its funding sources if it expands.

7.1 What options are there for plain language institutions?

Option 1: work through existing organisations

The first option to consider is the simplest: leave existing organisations to take up the activities recommended in this paper. These might include plain language organisations such as PLAIN or Clarity (for certification, publications and advocacy), but also universities (training and research) or other relevant bodies such as the International Organization for Standardization (standards).

Even if existing plain language organisations do not respond, it is possible that others will act on the ideas discussed in this paper. As the previous chapter on training outlined, universities in Europe are already preparing a project to develop a graduate curriculum for plain language. Plain language laws in South Africa are already raising questions about how practitioners might be certified. Existing plain language organisations could work to influence some activities while taking others on themselves.

The main advantages of leaving the work for existing organisations are that we make the best use of existing resources and do not set up a body that might compete for funds. As it represents the option of least change, it may also be more readily acceptable.

It is likely that plain language organisations will need to be involved even where other organisations take on some tasks. A body like the International Organization for Standardization might be persuaded to develop plain language standards, but it would not have the expertise to develop them without input from plain language experts. Likewise, many existing universities would need the expertise of practitioners to develop the most effective training.

Even if these disparate organisations did decide to introduce the activities this paper recommends, there would remain the challenge of coordinating their efforts to establish consistency. This suggests that plain language organisations may need to have some kind of coordinating influence. The chief difficulty here is that existing plain language organisations may not have the resources, and in some cases the charter or interest, to pursue the full range of activities discussed in this paper.

Clarity, for example, has a focus on legal language, is not a legally constituted body and operates through an active but voluntary committee. The Center for Plain Language in the United States is a national rather than an international organisation, and its focus is understandably directed towards national action and interests. The Plain Language Association InterNational (PLAIN) is now a legally constituted body with a functioning board and has the most potential to take on the activities outlined in this options paper. But like Clarity, its resources are limited: it has no office, no paid staff and is run by a voluntary committee.

Option 2: an informal federation

The next option would overcome this limited coordination by establishing informal cooperative action without forming a new legal entity. This option in fact represents the status quo, given that three plain language organisations jointly formed the International Plain Language Working Group that has produced this paper.

In 2007, PLAIN, Clarity and the Center for Plain Language each nominated two members to form the working group, and agreed on a further six members to represent a range of countries and languages. The group first met at the Clarity conference in Mexico City in November 2008 and agreed on the topics explored in this paper. The member organisations reviewed a preliminary draft of the paper after the PLAIN 2009 conference in Sydney, and this published version reflects their feedback.

The easiest way to implement option 2 would be to continue with the International Plain Language Working Group as the means for the plain language community to co-ordinate international action. Before doing so, it would be worth considering whether the working group model is the most suitable for the longer term, or whether another model might be adopted. This may mean changing the name of the group, writing an informal statement of purpose, reviewing the process for selecting members, or even confirming participation as part of each organisation's own objectives or governance structure.

Option 3: a formal federation

The next step from informal cooperation through a working group is to formalise the mechanism by establishing a separate legal entity.

This has one clear disadvantage: cost. If an informal structure can achieve the necessary cooperative action, establishing a new entity may take resources from the member organisations, perhaps for little gain. Volunteers run most plain language bodies, and their efforts may be diluted if they have to administer and report through yet another set of meetings and financial statements.

Yet the argument in favour of establishing a formal body directly addresses this concern. There is one major flaw in maintaining an informal body: funding. Without a legally constituted entity, no working group would be able to apply to most public or private sources for grants to finance the activities this paper explores. If we rely solely on volunteer efforts, it will take much longer to achieve whatever activities we reach consensus on.

Option 3 would therefore take the status quo one step further and incorporate the current working group as a formal legal entity. We could justify the extra administrative burden of a formal federation body if it means securing project funding that would pay plain language practitioners to develop standards, or research, or training, or advocacy.

The curriculum development project discussed in the training chapter is an example of where there is a real possibility of securing funding—in this case up to €300,000 from a European Union program. Yet international plain language practitioners are hampered in becoming part of this project because they have no formal legal entity to apply through.

Option 4: an entirely new organisation

The final option would be to establish an entirely new body. This might take on a broad mandate to implement all of the agreed options that emerge from this process, including:

- authorising a standard definition
- establishing standards
- setting up professional certification and training
- pursuing research and publications
- advocating for plain language.

Such a body would replace the International Plain Language Working Group and work to professionalise plain language. It may also take on activities (such as conferences and publications) that existing organisations offer and may over time supersede them.

This approach has the advantage of creating a single organisation with better coordination and economies of scale. However, it would be far more costly to set up and existing organisations are likely to see it as an unnecessary competitor.

The alternative would be to establish a new organisation with a more limited mandate that complements existing organisations and

their activities. One approach, for example, might be to form a professional association, focusing on activities such as standards, certification and training, leaving advocacy, conferences and publications to existing organisations.

A new organisation with a narrower mandate would reduce the resources required, but it does not solve the problem of having to rely on several organisations to achieve the full range of recommended activities. We would also not have the benefits of a single coordinating authority to maximise the effectiveness of international action.

Of course, it may be possible to remain with status quo, move toward option 3, and assess the desirability of option 4 over time. There is in some respects a logical evolution from one option to the next. But that also suggests we should avoid jumping too far too fast. The current feedback is that option 4 would be too ambitious as a next step.

Recommendation

We recommend working toward option 3, a formal federation of existing organisations through a constituted body that has sufficient legal status to apply to relevant bodies for funding. This approach would formalise the existing arrangements of the International Plain Language Working Group by one further step. The fallback position would be to continue international cooperation by maintaining the working group.

7.2 What spheres would a plain language institution operate in?

This section assumes that we will continue some kind of international cooperation, most likely through option 2 (the status quo) or option 3 (a formal federation), but with option 4 (a new organisation) a more remote possibility. In any of these cases, we need to define the spheres of interest that an institution might operate in. The following discussion will refer simply to 'an institution' or 'an international institution' without prejudging which option we might adopt.

International or national?

Any institution's focus should almost certainly be international. There is little point in duplicating the activity of national organisations. Whether a group or a federation, the institution should be seen as a mechanism for international cooperation and development of plain language to strengthen the public benefits that it will bring.

Section 3.1 discussed the relationship a new institution would have with existing international bodies such as PLAIN and Clarity. The next challenge we face is how the international institution would relate to existing national organisations. We recommend that it should focus on supporting national plain language bodies where they exist, such as the Center for Plain Language in the United States or the Association of Swedish Language Consultants in Sweden, and not replicate their services.

For example, the institution could advocate for plain language in a country where the concept is new, providing expertise and authority. The 'citizens' language' initiative in Mexico was an example of how that can work. But once it fosters national bodies, the international institution could then redirect its resources to other countries. The overall goal of its advocacy program would be to maximise the international impact of plain language.

Similarly, if the institution develops a certification program, it should do so with reciprocal arrangements with national bodies that already offer certification (currently only Sweden). The international institution need not have its own system for testing professional memberships in that country. But where a country does not have certification, the international institution could take on that role until a local industry association develops.

Standards could also benefit from a complementary approach. As the earlier chapter discussed, there could be a high-level international standard set by an international body, which is then supported by more detailed national standards adapted to the local language and context.

Where training programs would benefit from international action, the institution could serve as the conduit for cooperation. The

option of applying for European Union funding to develop tertiary-level plain language courses is a perfect example. There would be great benefit in linking expert practitioners with universities to develop a standard curriculum that can be taken up in a range of countries. Having a formal entity would help us access funds to do so in a way that is not feasible for national organisations.

Recommendation

We recommend that the activities of any international institution should be focused internationally, working closely with national bodies rather than replicating their work.

7.3 What would the legal structure of a new international body be?

While questions of the scope and spheres of operation are vital at the outset, the first practical hurdle would involve the logistics of setting up a new organisation. Here, there is uncertainty about the best way to proceed.

Jurisdiction

If we proceed with options 3 or 4, the new entity would need to be legally constituted so it can enter into contracts, operate bank accounts, apply for funding, and so on. The first question is what country the organisation might be constituted in and what laws it would operate under.

The two current international plain language organisations face a similar problem. The Plain Language Association InterNational (PLAIN) is now formally constituted in Canada, which sets minimum requirements for Canadian participation on the Board. While Clarity has recently debated a draft constitution, it is not yet a legal entity at all.

We looked briefly at the option of setting up 'internationally' under the auspices of the United Nations under Article 71 of the UN Charter. Even if this were feasible (which is doubtful) it would not necessarily be to our advantage. Doing so may mean the organisation could not then undertake activities related to those of an industry association.

If we are to take a further step from the status quo and form a legal entity, we face the potentially vexed question of choosing a country and jurisdiction to incorporate in. The organisation could operate internationally from there, and perhaps set up subsidiary entities in other countries if necessary.

One way to proceed would be for the International Plain Language Working Group to put the concept out for expressions of interest from various countries and select the best proposal we receive. Another approach would be to choose a location to complement existing organisations. With PLAIN constituted in Canada and the Center for Plain Language in the United States, there may be a case for establishing the new institution in Europe to advance plain language in that part of the world.

Jurisdiction may also be influenced by the availability of funding. There are strong prospects for financial support from the European Union, but taking advantages of these would require a European legal entity. Establishing the institution in Europe may also help to reach a wider range of countries and languages than may be the case if it were constituted in North America. We will need to weigh up all of these factors.

Legal structure

The second question to resolve is the appropriate legal model of any new body. Would it be best to make it a for-profit corporation, or a corporation limited by guarantee, or perhaps an incorporated association with a non-profit charter?

Our recommendation is to set up any new body under a structure such as a non-profit company limited by guarantee (in a Commonwealth country) or the equivalent to that in the jurisdiction the organisation may be located in. This means that any profits could not be shared among members, but must be directed to the activities of the organisation. But it also gives potential directors more protection against personal liability and strengthens the scope for revenue-generating activities to subsidise its public programs.

One disadvantage of this approach is that a member of a company limited by guarantee must be a legal entity. Of the three members proposed for the federation model under

option 3, Clarity does not yet have legal status. One way forward would be for the president of Clarity to be the company member as trustee for Clarity. But this requirement may vary depending on where the institution is established.

Organisational structure

There would certainly need to be a governing Board for any new body, operating to a legally constituted governance framework. This may be its constitution, perhaps supplemented by a reporting framework or policy manual. Board memberships would be voluntary positions taken up by industry practitioners rather than professional directors.

To achieve the option 4 model, the organisation would almost certainly need paid professional staff. Options 2 and 3 could proceed with a voluntary Board and only establish offices or staff if it secures the resources to do so.

Name

The other potentially divisive question could be the name of a new body. The words 'international' and 'plain language' are probably a given to include, but the keyword that needs most consideration is what type of organisation it is styled. Options used by similar bodies include:

- institute
- association
- federation
- society
- college.

'Association' or 'college' carry connotations of a professional association, while 'society' and 'institute' have equal connotations of educational and public purpose. 'Federation' may be attractive as a way of describing option 3, but may become less accurate if the organisation evolves toward option 4. 'Federation' also has connotations related to industrial organisations such as trade unions rather than professional associations.

The consensus among the International Plain Language Working Group favours the word 'institute', although some of the members are also attracted to 'federation'. Either would carry the necessary connotations for its professional status as well as its public purpose.

Of course, this issue will not arise if the plain language community adopts option 2 and decides to retain the International Plain Language Working Group and its name.

> **Recommendation**
>
> We recommend that if the plain language community adopts option 3, the Plain Language Working Group should canvass international interest in establishing the institution within a specific country. The group can then assess the best legal status, organisational structure and name.

7.4 What memberships would an international institution have?

The membership of an international institution will depend on the option the plain language community chooses.

Members of a continuing working group

If we proceed with option 2, then existing membership arrangements could continue. This means the three member organisations would be PLAIN, Clarity and the Center for Plain Language, each of which can nominate two members plus a candidate for Chair. Another six members would be selected by this group to represent a range of countries and languages.

The original group included three representatives from the United States, one from Canada, three from Europe, two from Australasia, one from South Africa and one from Asia. A balance of genders was also a factor, with seven women and five men.

However, if we decide to proceed with this option, it would be worth reviewing whether this remains the best membership structure, particularly as the three member organisations are heavily biased toward the English language and to North America. We could formalise membership from organisations such as the Association of Swedish Language Consultants. Yet this may bias the membership away from countries that do not have established plain language organisations, or where relevant organisations are commercially constituted

but have public programs, such as the Plain English Campaign (UK) or the Plain English Foundation (Australia).

Members of a federation body

If we pursue option 3, then we would be forced to resolve these issues and codify the membership in a formal constitution. The easiest approach would be to limit the membership to the three organisations that initiated this process. PLAIN, Clarity and the Center for Plain Language would be constitutional 'shareholders' of the new entity.

We could also consider expanding the organisations that would become constitutional members (like shareholders) by establishing a more open organisation membership category. This would provide maximum flexibility and make the international institution a more representative umbrella for cooperative relationships between a growing range of national bodies. There could even be separate organisational membership categories for 'for profit' and 'not for profit' members.

As a first step, it may be practical to restrict members to those that formed the International Plain Language Working Group, but write its constitution with the flexibility to add other member organisations over time.

Individuals

Individual membership of the institution will depend on the activities it decides to take on. If a federation body does not administer standards or a certification program, there may not be the need for individual members. The institution would also need to be careful that individual membership did not imply competence in professional practice unless it had the structures in place to assess that.

If the institution did offer certification, it would need to test (and re-test) the competence of members and offer them professional recognition in return. The individual membership may be tiered to reflect the experience and seniority of each practitioner. The institution would need to develop a charter of ethics and have mechanisms to enforce it.

Like broader organisational membership, it is unlikely that the federation model envisaged by option 3 would introduce individual membership at the outset and may in fact never do so. But it may also be worth reflecting the possibility in its constitution so that individual membership could be included if the organisation moves in that direction.

> **Recommendation**
>
> We recommend that an international institution under option 3 should have a limited organisational membership at the outset, but consider including provisions for expanded membership in the future.

7.5 How would a new institution be funded?

There are three possible sources for funding an international plain language institution:

- public or private funding bodies
- membership fees
- fees for services.

Under option 2, there would be very little scope for funding from any of these sources, and the working group would need to proceed on a largely voluntary basis. This is how it has operated to date, with individual members providing their time unpaid. Some organisations have provided in-kind support, such as the Plain English Foundation hosting the group's e-forum and Clarity publishing the options paper in its journal.

Public and private sources

Under option 3, grants from public or private sources would provide the main funding for a formal institution. Indeed this is the main reason for moving from the status quo to a federation model. To apply to bodies such as the European Union or to a private educational trust, we would need to be a legal entity, perhaps with some tax deductible status.

Organisation membership fees

Under option 3, there would also be the possibility of organisational members contributing to the new institution, but the reality is that this support would be in-kind rather than by funding. Organisational membership fees would only become realistic if the membership expands and the institution moves closer toward option 4.

Service fees

It is only under the option 4 model that individual members would become more prominent as part of a professional membership and certification system. In this case, membership, educational and certification services would be a primary source of income. This is a standard model for professional associations.

Similarly, any standard that an option 4 institution develops could be made available at a cost. This doesn't prevent a 'short form' or summary of the standard being publicly available, but the full standard would be available for purchase only. This is largely the model that organisations like the ISO operate under.

Activities such as publications could also be funded by commercial sale or inclusion as part of membership fees. Back issues of journals or occasional papers could also be made available as e-documents on a cost recovery basis. This may also be feasible under option 3. The three member organisations might decide to make the journal *Clarity* the official publication of all three organisations to extend its subscription base and resources.

Activities such as conferences can also potentially make a profit to be returned to the institution's general activities. However, given that Clarity and PLAIN both already run international conferences, this may be a lower priority for the new body unless all three organisations agree that the new institution take on this role.

Recommendation

We recommend that the institution should initially seek funding from public and private bodies rather than membership fees and services, but consider broadening its funding sources if it expands.

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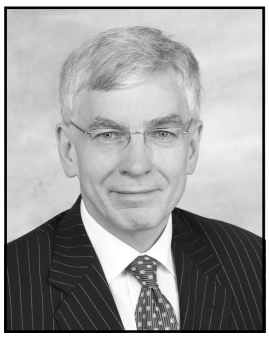

Eamonn Moran *is Law Draftsman in the Department of Justice of Hong Kong, and a Member of the Law Reform Commission of Hong Kong. He has 35 years experience in legislative drafting, including eight years as Chief Parliamentary Counsel in Victoria, Australia. He is currently President of the Commonwealth Association of Legislative Counsel.*

Eamonn is a keen supporter of the use of plain language in legislative drafting and in 2005 was awarded an Australian Public Service Medal for 'outstanding public service to legislative drafting and public law, and to the promotion of plain legal language'.

Dr Neil James *is Executive Director of the Plain English Foundation in Australia, which combines plain English auditing, editing and training with a campaign for more ethical and effective public language.*

Neil has a doctorate in English and has published three books and over 60 articles and essays on language and literature. His latest book Writing at Work *focuses on reforming the rhetoric of the professions.*

Neil is a regular speaker in the media throughout Australia, where he features on the ABC Radio network. He co-convened the PLAIN 2009 conference with Dr Peta Spear and is currently chair of the International Plain Language Working Group.

How to join Clarity

The easiest way to join Clarity is to visit http://sites.google.com/site/legalclarity/, complete an application, and submit it with your payment. You may use PayPal or a credit card to pay.

Prospective members in Canada, Italy, and the United States may also pay by bank draft. If you prefer to submit a hard copy of the application, you may contact your country representative for submission instructions. Country reps are listed on page 2.

Message from the Presidents

Christopher Balmford's term as president finished at the end of 2010. So—as recommended by the members' meeting in Lisboa, and as approved by Clarity's Committee—Clarity's president elect, Candice Burt, became president. Candice's term is for 3 years, ending on 31 December 2013.

This message from the presidents is in 3 parts—a joint message from both Candice and Christopher, and then a note from Christopher and a note from Candice.

International Plain Language Working Group's options paper

This issue of *Clarity* publishes the draft of the International Plain Language Working Group's options paper on standards. The group consists of representatives from Clarity, PLAIN (see http://plainlanguagenetwork.org/), and the Center for Plain Language (see http://centerforplainlanguage.org/).

Preparing the options paper has been a long and spirited process. At PLAIN's 2009 conference in Sydney, the group distributed hardcopies of an early draft that had been produced after a great deal of useful work. Much further work has been done since then to get the options paper ready for full publication.

For a year or so, this issue of *Clarity* had been set aside to publish the options paper. Everyone involved in drafting and reviewing the options paper apologises for the delay in completing the paper which has caused the delay in getting this issue of the journal to you. Even so, they—and everyone involved in running Clarity—hope you share our view that the quality of the paper, and the importance of the topics it discusses, justify the delay.

Ongoing conference success

Clarity's conference in Lisboa, in October 2010, was a great success. Our congratulations and thanks to Sandra Fisher-Martins of Portuguese Claro for organising and hosting the conference so brilliantly.

The system of Clarity and PLAIN holding conferences in alternate years works well. PLAIN and its conferences have a broad, multi-discipline focus. Clarity, its journal and its conferences, have a focus on legal communications—while welcoming members, delegates, speakers, and papers from all fields.

Clarity's and PLAIN's conferences manage always to build on the achievements and successes of each organisation's earlier conferences. Given the outstanding success of PLAIN in Sydney in 2009 and Clarity in Lisboa in 2010, we are eagerly awaiting PLAIN in Stockholm in 2011. See http://www.plain2011.com/.

One way in which the conferences improve is in the sharing of papers after the conference—increasingly, this happens both in print and online, in writing, and in film.

In the next issue of *Clarity*, you will be able to read the highlight articles from the Lisboa conference. That issue of Clarity is being prepared. We fully expect it will be mailed to you on time in May 2011.

Evolution of the plain-language world and of Clarity

The evolution of the plain-language world, and of Clarity, have been the main topics in recent:

- messages from the president, see *Clarity* 63 May 2010, p 42, downloadable at http://www.clarity-international.net/pastjournals.html1
- Clarity's newsletters. The newsletter is emailed to members for which we have an email address. If you are not receiving it, then you can arrange to do so at http://www.clarity-international.net/join.html.

The discussion about the evolution of Clarity has reviewed:

- the ongoing broad changes in the plain-language world
- the need for Clarity to evolve in response to those changes
- how Clarity might evolve.

Although the discussions have involved some tension and some sadness, the good news is that—at the well-attended Clarity members' meeting in Lisboa—Clarity's members recom-

mended to the Clarity Committee that it approve and implement a range of proposals for Clarity's evolution. Those proposals had been circulated to members in the messages from the president and in Clarity's newsletter.

The further good news is that Clarity's Committee approved the members' recommendations.

You can read the minutes of the Members' meeting here: http://www.clarity.shuttlepod.org/Resources/Documents/Clarity%20Minutes--Lisbon%202010.doc

Highlights of Clarity's pending evolution are:

- a website revamp—in fact, the revamp has well and truly begun, with more to come. Our thanks to Helena Englund Hjalmarsson.
- launching social networking activities
- surveying members about Clarity's role and structure
- revamping the design of Clarity's logo, website, and journal
- setting up a committee to prepare a draft constitution for Clarity. Our thanks to Eamonn Moran QC for agreeing to chair that committee and to Sandra Fisher-Martins, Amy Bunk, John Wilson and Ben Piper for volunteering to serve on it.

Play a part

Clarity's future is bright—there is much to be involved in, to contribute to, and to learn from.

With our long-awaited online membership system in place, you can join and renew online—please encourage others to join too. See http://www.clarity-international.net/join.html.

Candice Burt, President of Clarity

Christopher Balmford,
immediate past President of Clarity

From immediate past president Christopher Balmford

Clarity is in good hands—and there are many of them.

The number of people actively supporting Clarity is growing. This is a wonderful thing. If we are to further professionalise the practise of plain language and to take the next step towards a reader-friendly world, then international organisations like Clarity and PLAIN need to step up and do more. For several years, this has been happening at PLAIN. Now it is happening at Clarity too.

My thanks to Candice for taking over as president. My thanks to many people for their support in my term—extra deep and abiding thanks to Julie Clement, Eamon Moran QC, Annetta Cheek, Sandra Fisher-Martins, Candice Burt, Helena Englund Hjalmarsson, Joe Kimble, Cindy Hurst (who has done Clarity's administrative work for years), Peter Butt, and Mark Adler.

Christopher Balmford,
immediate past President of Clarity

From current president Candice Burt

In Lisboa—as is always the case at a plain-language conference—the quality of the conference sessions, and the enthusiastic discussion between them, showed the strong support people have for Clarity's activities and aims. Also—and perhaps for the first time—the discussion at the members' meeting, and its recommendations to the Committee, showed equally strong support for Clarity's plans.

My thanks to Christopher for initiating and working tirelessly to shape this round of Clarity's evolution. It is always challenging to steer an organisation in a new direction, and Christopher has taken on this challenge with determination, focus, and his ever-present sense of humour.

The next step is surveying members so that the Committee better understands members' views about Clarity's role and structure. With that understanding, we will be better able to shape Clarity's constitution, focus, and activities. In turn, as Clarity evolves, we will be better able to professionalise, to advocate for, and to deliver plain language.

Candice Burt, President of Clarity

Clarity … the journal

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