

**U.S. Department of Veterans Affairs (VA)
Plain Writing Act Compliance Report
April 2014**

I. Senior Agency Official for Plain Writing:

The following VA team is responsible for implementing the Plain Writing Act and is listed on VA's Plain Writing Internet Webpage. These individuals can also receive inquiries and comments from the public:

- a. Bonnie Miranda, Executive Secretary, Office of the Secretary, Office of the Executive Secretariat
- b. Gemma Button, Deputy Executive Secretary, Office of the Secretary, Office of the Executive Secretariat
- c. Liz Tate, Chief, Executive Correspondence, National Cemetery Administration
- d. Katrice Pasteur, Director, Office of Executive Correspondence, Veterans Health Administration
- e. Andrea Downs, Executive Reviewer, Veterans Benefits Administration.

The Department's Staff Offices also provide representatives who serve on VA's Plain Language Working Group.

Participating Staff Offices include:

- Office of Acquisition, Construction, and Logistics
- Office of Management
- Office of Information and Technology
- Office of Policy and Planning
- Office of Congressional and Legislative Affairs
- Office of General Counsel (Regulation Rewrite)
- Office of Security and Preparedness
- Office of Survivors' Assistance
- Center for Women Veterans

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

VA has issued several types of communications to the public in a format that is consistent with the Plain Writing Act. Some examples include: eBenefits.gov electronic brochures explaining VA benefits (over 3.6 million users; some examples of brochures attached); easy to read web pages on the Affordable Care Act; eligibility letters to VA beneficiaries regarding health care enrollment; claims development letters to VA applicants clarifying what is needed to process their claims; forms; VA blogs; and other information posted on social media.

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

- a. Information on the Act is posted on the Department's internal and external Web sites and available at the following links: <http://www.va.gov/>, <http://www.va.gov/open/>, and http://www.va.gov/opa/Plain_Language.asp.
- b. To facilitate compliance with the Act at VA's field facilities, its requirements were briefed to leadership during VA's Executive Leadership Board on the following dates: October 31, 2013; November 14, 2013; and December 2, 2013.
- c. The Act's requirements were briefed to Office of the Secretary (OSVA) leadership during the OSVA Special Programs Meeting hosted by the VA Deputy Chief of Staff. Plain language requirements and updates were a topic of discussion at the following meetings: July 10, 2013, August 12, 2014, September 9, 2013, October 15, 2013, November 12, 2013, December 9, 2013, January 13, 2014, February 10, 2014, and March 10, 2014.
- d. A Plain Language Document Testing class was provided to 30 of VA's key writers and editors on March 27, 2014. Participants were informed of the goal to create a Department Plain Language Compliance Testing Working Group to review public-facing documents. This group will conduct protocol and usability testing on multi-use documents (documents sent out to hundreds or thousands of people). The group will reach out to Veterans Service Organizations (VSO) for assistance in testing. The VSOs, representing our Nation's Veterans, are VA's primary target audience. With their feedback and approval on a multi-use document, VA will have assurance it will be in compliance with plain language. Results of the testing will be made public to VA employees so others can learn from previous tests when writing similar documents.

IV. Training

VA's Learning University (VALU) developed a series of 14 learning modules to educate Department employees who write policies, reports, memos, briefs, and other business documents. To date, 1,149 employees have taken these modules and are actively applying the plain language techniques and requirements.

The following courses were offered by VALU during their Summer and Winter Learning Series (see attached flyers).

Prerequisite eLearning Module: Formal Writing Using Plain Language – 2 hours: A Web-based training (WBT) that presents a practical approach to understanding Plain Language.

Module 1 - Addressing Data Calls – 4 hours: Learn how to address data calls with accuracy, diplomacy and professionalism.
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<p>Module 2 - Drafting Memorandums – 4 hours: Learn how to communicate effectively to internal audiences by drafting clear and concise memorandums that convey complex information, establish policy guidance or request action.</p>
<p>Module 3 - Writing Issue Briefs – 4 hours: Learn how to summarize information on an issue or event and deliver clear and effective issue briefs to inform VA Leadership.</p>
<p>Module 4 - Responding to Congressional Inquiries – 4 hours: Learn how to tailor written communications for positive impact and provide succinct, diplomatic responses to congressional inquiries.</p>
<p>Module 5 - Evaluating Data & Summarizing Findings – 4 hours: Learn how to present data for the greatest impact and accurately summarize findings for all audiences.</p>
<p>Module 6 - Writing for Procurement – 4 hours: Learn how to write key procurement documents to procure goods, and services, or receive internal funding.</p>
<p>Module 7 - Writing Strategic Plans – 4 hours: Learn how to write strategic plans, including vision and mission statements, values, goals and SMART objectives.</p>
<p>Module 8 - Writing Grants – 4 hours: Learn how to write clear, succinct and compelling grant responses.</p>
<p>Module 9 - Writing Business Cases – 4 hours: Learn how to write accurate and convincing business cases for decision makers.</p>
<p>Module 10 - Writing Position Papers – 4 hours: Learn how to write succinct and compelling position papers to generate awareness or support for an issue.</p>
<p>Writing Journey: Formal Writing Using Plain Language – 1 Day (8 hours) Writing Journey: Formal Writing Using Plain Language – 2 Day (16 hours) Go to the next level in your writing journey by providing interactive, hands-on application of techniques for writing complex documents using plain language and VA guidelines.</p>
<p>Document Testing – 3 hours: Learn how to perform Plain Language compliance testing on documents.</p>

To reach a larger VA audience, Modules 1 – 10 and the 2 Writing Journey courses were restructured into a virtual/Web-based format. On March 30, 2014, pilot testing of the new course format was completed. It is expected the courses will be available in virtual format by late summer 2014. VA employees, who regularly compose letters, reports, and develop public-facing documents, will be the primary audience for these training modules.

The VALU courses and the number of employees trained are provided below:

Course Name	Method of Delivery	Number of Employees	Dates Trained
Formal Writing Using Plain Language	Online and Broadcast	1,042	1/1/2013 – 12/31/2013
Formal Writing Using Plain Language	Broadcast	56	5/1/2013-10/31/2013
Writing Journey: Formal Writing Using Plain Language	Instructor-led	21	6/19/2013
Testing for Plain Language	Instructor-led	30	3/27/2014
Total Employees Trained		1,149	

V. Ongoing Compliance/Sustaining Change

- a. VA is producing one of the largest Plain Language regulation rewrite projects ever attempted by a Federal agency. The staff is currently rewriting and reorganizing all 280 of its regulations on disability compensation benefits. The goal is to make VA's regulations easier to understand and apply, which will help Veterans and their Survivors better understand their rights and also assist Veterans Service Organization representatives who advocate for them. VA published 20 proposed rules for public comment from 2004 to 2011 in the Federal Register on November 27, 2013, with a 120-day comment period. Below is an example of the regulation before and after the rewrite:

Current

38 Code of Federal Regulations 3.303, "Principles relating to service connection."

(a) *General*. Service connection connotes many factors but basically it means that the facts, shown by evidence, establish that a particular injury or disease resulting in disability was incurred coincident with service in the Armed Forces, or if preexisting such service, was aggravated therein. This may be accomplished by affirmatively showing inception or aggravation during service or through the application of statutory presumptions. . .

Rewritten in Plain Language

38 Code of Federal Regulations 5.243, "Establishing service connection."

(a) Requirements. Proof of the following elements is required to establish service connection:

- (1) A current disability;
- (2) Incurrence or aggravation of an injury or disease in active military service; and
- (3) A causal link between the injury or disease incurred in, or aggravated by, active military service and the current disability.

- b. VA plans to develop a national system for testing public-facing documents (those sent to hundreds or thousands of people) for Plain Language compliance. Employees from the Administrations and Staff offices who received training on March 27, 2014, expressed interest in establishing a VA Plain Language Compliance Testing Working Group that would be responsible for testing documents prior to release. This working group is currently being established and will implement a clearance process to ensure all public-facing documents are thoroughly tested prior to release.
- c. VA's Plain Language Working Group, consisting of representatives from VA Administrations and Staff offices, meets quarterly to provide recommendations for implementing the Act, and disseminate information throughout the respective Administrations and Staff Offices.

- d. VA will develop its Plain Language Policy by September 30, 2014.
- e. VA is in the process of updating its forms policy, VA Directive 6310, and the Act's requirements were added to ensure all new and revised forms are in compliance.

VI. Agency's plain writing Web site

- a. Web site address: http://www.va.gov/opa/Plain_Language.asp
- b. Contact us page: http://www.va.gov/opa/Plain_Language.asp, VAPlainLanguage@va.gov
- c. Link from VA's home page: <http://www.va.gov/>
- d. Link from VA's Open.gov page: <http://www.va.gov/open/>
- e. Links to Compliance reports: http://www.va.gov/opa/Plain_Language.asp 2013 and 2014 reports are available.
- f. Links to OMB and PLAIN: http://www.va.gov/opa/Plain_Language.asp

VII. Customer Satisfaction Evaluation after Experiencing Plain Writing Communications

VA currently uses two types of document testing:

1. Cued protocol testing for letters and simpler documents to ensure the reader understands what VA intended to say.
2. Usability testing for complicated formats such as forms, brochures and informational packets. This technique ensures that the reader can easily find the information needed and can supply us with the information we need. Past testing caused us to completely redesign documents, as well as change wording. In some cases it taught us what Veterans expect in a letter that we had not included. Adding that information saves Veterans time because it lessens their need to call VA's toll-free number with questions, and makes VA more efficient by allowing employees to focus on processing claims and providing other services. In addition, VA received very positive feedback from its clients because they felt that they were part of the process. VA is about to launch a much larger scale testing protocol that will eventually reach across the country, allowing offices and hospitals anywhere to test with their particular group or clients.

Example of successful testing:

The Veterans Health Administration (VHA) Office of Informatics and Analytics (OIA) received the ***Award of Distinction*** for its entry, "Donate My Data"

brochure, from the Center from Plain Language. The entry compares two versions of the “Donate My Data” brochure, transforming it from a bureaucratic, internally-focused publication to one that is more customer-focused, easy-to-understand and very well-received based on feedback from Veterans. VHA OIA honorees will be recognized at a ClearMark Awards ceremony scheduled for Tuesday, April 22, 2014, at the National Press Club in Washington, D.C.