

p kestaff

PLAIN
LANGUAGE
COMMISSION

Pikestaff 55
March 2012

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Your language isn't clear, says investigator of border security muddle

Less than 12 months after the inquest into the '7/7' London terrorist attack, when Lady Justice Hallett pleaded for fire and police officers to use plain English, lack of clarity is again causing chaos, this time in the immigration system. The Independent explains:

The UK Border Agency is to be stripped of its enforcement powers after an investigation uncovered a catalogue of failures that allowed hundreds of thousands of people into the country without adequate checks.

Theresa May, the Home Secretary, ordered that the UK Border Force be separated from the UK Border Agency (UKBA) and established as a separate force with a senior police officer put in charge. Its enforcement role includes refusing entry to passengers without suitable entry papers, catching smugglers, identifying fugitives and arresting illegal immigrants.

The split follows repeated failings in border security checks, identified in *An investigation into border security checks* by John Vine, Independent Chief Inspector of the UKBA. Vine launched his inquiry last year after it emerged that border checks were being relaxed at ports and airports without ministerial approval. The report criticizes both the UKBA and ministers for a 'lack of clarity', commenting:

22. We found that the language used in both the "Summer pressures" submission to Ministers and the response provided, was not clear and as a result was open to misinterpretation. Given the importance of decisions to suspend border security checks, it is imperative that the language used is absolutely clear and unambiguous. For example, the written response from the Home Secretary's office said that "the change in checks should not be a routine measure but only used when the queues get beyond a reasonable length." As the key terms were not clearly defined, we found this had been interpreted and operated in different ways at different ports.

23. There was a further lack of clarity in the Agency's Interim Operational Instruction as it



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failed to define what was meant by “further measures.” We found that there was no explicit reference in the submission to Ministers about the possibility of introducing “further measures” either on health and safety or other grounds.

The report's 12 recommendations include one on clearer official language: 'Ministerial decisions, policy proposals and operational instructions must be communicated effectively with specific and careful use of language.' You can see the full report at <http://icinspector.independent.gov.uk/wp-content/uploads/2010/03/Investigation-into-border-security-checks-20.02.121.pdf>.

[Source: The Independent, 21 February 2012: <http://www.independent.co.uk/news/uk/politics/may-admits-500000-entered-uk-without-full-security-checks-7237427.html>]

US health insurers must use plain words – but government sets bad example, says StyleWriter

There's good news from the US: health insurers must now use plain language to describe benefits and policies. Under new rules published jointly by the Departments of Health and Human Services, Labor and the Treasury, health insurers and group health plans must provide 'clear, consistent and comparable information about health benefits and coverage to the millions of Americans with private health cover'. Specifically, the rules ensure consumers receive two forms that will help them understand and assess health-insurance options:

- a short, easy-to-understand Summary of Benefits and Coverage (SBC)
- a list of definitions (called the 'Uniform Glossary') that explains common terms in health insurance, such as 'deductible' and 'co-payment'.

But how good is the federal government at setting an example to the health-insurance industry on how to use plain language? Not very, thinks Nick Wright, director of Editor Software. Nick has analysed the press release of the Department of Health and Human Services, *Health Reform to Require Insurers to Use Plain Language in Describing Health Plan Benefits, Coverage*, using StyleWriter (plain-English editing software), with the following results:

- Grade level = 16 (rated as 'difficult').
- Average sentence length = 27 words ('bad').
- Style index (a measure of style faults) = 71 ('bad').
- Bog index (a measure of overall style and readability) = 60 ('poor').

Only on active verbs did the press release score well. The graphics on page 3 show these results and how they appear in StyleWriter.

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Measure	Original	Target	Redraft	Rating	Save	OK
Total Words	477				<input type="checkbox"/>	<input type="checkbox"/>
Average Sentence	26.5	11 to 18		Bad	<input type="checkbox"/>	<input type="checkbox"/>
Passive Index	6	up to 10		Excellent	<input type="checkbox"/>	<input type="checkbox"/>
Style Index	71	up to 10		Bad	<input type="checkbox"/>	<input type="checkbox"/>
Bog Index	60	up to 10		Poor	<input type="checkbox"/>	<input type="checkbox"/>
Reading Grade	15.9			Difficult	<input type="checkbox"/>	<input type="checkbox"/>
Jargon	1	none			<input type="checkbox"/>	<input type="checkbox"/>
Glue		33%	up to 50%		<input type="checkbox"/>	<input type="checkbox"/>

Here's a flavour of what the Department of Health and Human Services wrote:

All health plans and insurers will provide an SBC to shoppers and enrollees at important points in the enrollment process, such as upon application and at renewal.

A key feature of the SBC is a new, standardized plan comparison tool called "coverage examples," similar to the Nutrition Facts label required for packaged foods. The coverage examples will illustrate sample medical situations and describe how much coverage the plan would provide in an event such as having a baby (normal delivery) or managing Type II diabetes (routine maintenance, well-controlled) These examples will help consumers understand and compare what they would have to pay under each plan they are considering.

Combining StyleWriter's advice and our editorial skills, we might redraft these paragraphs as follows:

All health plans and insurers will give people a Summary of Benefits Coverage (SBC) at key points, for example when they apply for or renew a policy.

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The SBC will help people compare plans using standard 'coverage examples', similar to the Nutrition Facts label on packaged food. These examples will describe the money paid out if, for example, you have a normal birth or routine Type II diabetes.

Nick comments: 'If the press office of a major agency can't write in plain language when writing about plain language, there's little hope of getting all federal employees out of bad writing habits.'

You can find:

- the full press release at <http://www.hhs.gov/news/press/2012pres/02/20120209a.html>
- the template for the SBC and glossary at <http://ccio.cms.gov/resources/other/index.html#sbcug>
- the regulation at http://www.regulations.gov/#!documentDetail;D=HHS_FRDOC_0001-0442
- a factsheet with more information at <http://www.healthcare.gov/news/factsheets/2011/08/labels08172011a.html>.

[Thank you to Nick Wright for sending us his analysis, which was originally published on LinkedIn: http://www.linkedin.com/groups/Health-insurers-now-must-use-158634.S.94405385?view=&gid=158634&type=member&item=94405385&trk=eml-anet_dig-b_nd-pst_ttle-cn]

PerfectIt – now with added freebie

Another piece of specialist software we find useful in our editing work, especially when working on very long documents, is PerfectIt. This checks for consistent:

- hyphenation and capitalization
- use of abbreviations (being defined once only, when they are first mentioned)
- capitalization of headings
- list/bullet capitalization and punctuation
- use of spelling variations.

PerfectIt can also generate a table of abbreviations, find comments accidentally left in documents and, in the Pro Edition, check figure and table labels.

A simplified version of PerfectIt is now available free of charge online. The Online Consistency Checker is secure, entirely automated and runs several tests that were previously only available with PerfectIt's paid-for version. Accepting documents of up to 10MB (including PDFs), it returns results in less than two minutes. Try out the free checker at <https://www.intelligentediting.com/onlinechecker>.

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International Plain Language Day – 13 October 2012

This year, International Plain Language Day has its own blog site – at <http://iplday.org>. Apart from regular updates, the site will list local events and include a media hub.

Local event organizers will have another resource for 2012: pre-recorded, online presentations of interest to the public, clients, and other plain-language writers and editors. After 13 October, the presentations will be available to the public on YouTube or Slideshare.

Readers write

We often receive questions on points of language use. Here are a few recent examples, with our answers.

- Q** I recently received this as part of a message: 'It appears that we have two different issues raised by one centre each.' That could read as if there were four issues. I think it should be: 'It appears that each centre raised a separate issue.' What do you think?
- A** We agree that the original sentence is ambiguous. Your rewrite works well, as long as there are (and readers know there are) only two centres. Otherwise, the number of issues raised could still appear to be more than two. An alternative that avoids this problem would be something like: 'It appears that each of (the) two centres raised a separate issue.' (The version with 'the' would be for if there are just two centres; removing 'the' suggests there are more than two.)
- Q** 'There are also many examples of wording in questions that is/are inaccurate and ambiguous and contains some spelling errors.' I presume this should be 'are' as the subject is 'examples'.
- A** If the subject is 'examples', then you are right that it should be 'are', but then the following verb would also have to be 'contain' (without the 's'). However, we think the relative clause ('that...errors') actually defines 'wording' not 'examples', so 'is' and 'contains' are fine.
- Q** 'One billion pounds was/were taken at the box office.' I think it should be 'were' to agree with 'pounds'.
- A** Although 'were' would agree with 'pounds', it's actually more usual to treat quantities as singular, so we'd say that 'was' sounds more natural in this context. In the *Cambridge Guide to English Usage*, Pam Peters gives these similar examples:
Twenty dollars takes you to the city and back.
Six weeks in the African desert isn't my idea of fun.

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Q 'In 2010, the number of people going to the cinema was just as high as in 2002 well before the introduction of 3D in 2009.' Something about this doesn't work.

A We think the sentence you quote does just about make sense, but it's not well punctuated. We'd add a dash after '2002', or even a comma and the words 'which was'. We assume the intended message is that the introduction of 3D hasn't increased cinema attendance.

Q 'A structure where there are/is a few sectors of...' I think it should be 'are'.

A You're right that the verb should be 'are' here. In the *Cambridge Guide to English Usage*, Pam Peters writes of 'a few': 'Note that despite the presence of *a*, it always takes plural agreement, as in: *A few buds were beginning to show.*'

Plain-English culture project

Lynda Harris, head of Write Limited in New Zealand is writing a handbook for people who wish to introduce a plain-English culture in an organization. The book aims to be practical and inspiring, providing information and help for people who want to transform the way an organization writes and communicates. As part of the book, Write Limited will be doing a number of case studies. Lynda's colleague, Diana Burns, writes:

We'd like to include case studies both from organisations Write has worked closely with, and from each of the other parts of the world where plain English culture change projects have taken place or are underway. Our idea is not that we hold the organisations we profile in the case studies up as perfect, but that we show they have embarked on a process with a strong commitment to plain English. We are looking for people in Britain who may have worked on such 'whole organisation' plain English culture projects, whom we could interview.

If you are interested in getting involved, email Diana@write.co.nz.

Simplification Centre update

In Pikestaff 10 (November 2007), we introduced the University of Reading's Simplification Centre. In 2011, the centre moved out of the university and became a not-for-profit organization dedicated to 'advocacy, innovative co-designing, and design education'. It states its mission as follows:

We want to make information easier to understand – the information we use every day to make important choices, or to understand our options.

We don't like small print.

We don't like jargon that hides the truth.

We don't like design that decorates but doesn't communicate.

We do like information we can find easily, that gets to the point, that sets out our choices in one place, that understands that we're human.

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Our own area of expertise is language and style, but we agree that design is important to making information clear and comprehensible. That's why we insist on seeing a copy of the final (typeset) version of any document we accredit. And in awarding our Clear English Standard, we take account of layout too, because clear writing and good structure need to be complemented by good use of type, white space etc.

See It Right

See It Right, a guide published by the Royal National Institute for the Blind (RNIB) has had a huge and positive impact on the presentation of public information. But the Simplification Centre has noticed that the Clear Print standard of a 12-point minimum is sometimes rigidly applied, with the result that tables and diagrams (which usually require smaller sizes) are discouraged. Yet well-made tables and diagrams can make information easier to use. In a new technical paper – *The Clear Print standard: arguments for a flexible approach* – the centre argues for (you've guessed it) a flexible approach. You can find out more about the RNIB's guide at http://www.rnib.org.uk/professionals/accessibleinformation/pages/see_it_right.aspx, and read the centre's technical paper at http://www.simplificationcentre.org.uk/Resources/SC10ClearPrint_v5.pdf.

Simple Actions

A new project in collaborative co-design, Simple Actions will take on 'information design problems no one seems to own'. The project is inspired by Design for Democracy (<http://www.aiga.org/design-for-democracy/>) and Making Policy Public (<http://makingpolicypublic.net>) in the US. The centre will make the results freely available for others to borrow, extend, comment on or test.

If you'd like to get involved – whether you're a designer, a writer, or an interested layperson – contact the Simplification Centre at info@simplificationcentre.org.uk.

Memorable memes

You may have come across the ubiquitous 'What people think I do/What I really do' meme, 'a series of visual charts depicting a range of preconceptions associated with a particular field of occupation or expertise' – see <http://knowyourmeme.com/memes/what-people-think-i-do-what-i-really-do>. (In case you're wondering, a 'meme' – more common in US than UK English, and pronounced 'meem' – is an idea copied from person to person; the term's a shortening of 'mimeme', of Greek origin, which means 'something imitated'.) The original version, summarizing various notions of what contemporary artists do, was produced in February by artist Garnet Hertz. It has since been adapted by others for many occupations.

Editors haven't been overlooked, with this version publicised by the Editors' Association of Canada, via the Society for Editors and Proofreaders. Can you do



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better for editing or your own job? Do send us your version – there's even a template on the website above; email to pikestaff@clearest.co.uk.

Editor



What my friends think I do.



What my mom thinks I do.



What writers think I do.



What society thinks I do.



What I really do.

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News and views (click on any item to view online)

- 18 February MP fights Excel Parking in TV show
- 18 February Students pooh-pooh clean-up posters
- 5 February Excel Parking's misleading signs: we complain to OFT
- 5 February Stockport Council backs down over Excel's bad signs
- 18 January Excel Parking at Ebbw Vale – MP slams ambiguity and small print

Jottings (click on any item to view online)

- 18 February When 'fair' means daylight robbery
- 18 February Bite the bullet and split long sentences
- 8 February Grievance with 'agreeance'
- 31 January Jordan's apostrophe tips
- 31 January Rumour: offside trap could put lizards on the line
- 31 January 'Hone' and 'home', 'flout' and 'flaunt'
- 31 January Electrocutation just got better
- 31 January Sum moor torque on heterographs

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Facebook

Pikestaff has its own page on Facebook, thanks to colleague James Fisher, who has kindly set this up for us and is posting regular features there. So visit <http://www.facebook.com/PikestaffNews> and have a look for yourself. What's not to 'like'?

Back issues

You can see back issues of Pikestaff on our website (<http://www.clearest.co.uk/pages/publications/pikestaff/pikestaffbackcopies>). Here you'll also find an index that summarizes each month's content.

Tell a friend

If you think friends or colleagues would enjoy Pikestaff, please feel free to forward the newsletter (or any part of it) to them.

Spread the word

We're happy for you to use any of our articles to promote plain language, provided you acknowledge Pikestaff as the source.

Rolling the credits

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