From gobbledygook to plain English: How a large state agency took on the bureaucratic form letter

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In an effort to reduce phone calls and improve customer service, the Washington State Department of Labor and Industries(L&I), in July 2001, launched "Plain Talk" – a year-long project to rewrite 100 bureaucratic form letters into plain English. Hundreds of thousands of form letters are used each year by L&I to process claims, to issue workplace safety and health citations, and to handle many other workplace issues. As the Plain Talk project manager, I decided to focus on the department's highest-frequency form letters and now work with 12 programs to rewrite them into clear and simple language. The effort is backed by a strong message from the governor and agency director, high-quality training, ongoing mentoring, and "reality check" usability testing. The project is due to be completed by the end of June 2002.

INTRODUCTION

The Washington State Department of Labor and Industries (L&I) administers the state's workers' compensation system, workplace safety and health inspections, and contractor registration programs. Its 2,800 employees serve 2.1 million workers and more than 60,000 employers. It sends more than 1.3 million pieces of mail each year and estimates that after benefit checks, legal notices, and individual correspondence, more than half of these mailings are form letters.

Most of the agency's attention to clear writing has been in rewriting regulations and developing clear brochures - all with great success and even regional recognition. But most form letters have remained in a language nether world, where abatements are certified, warrants are satisfied, claims are adjudicated, and interlocutory orders are issued. When the Plain Talk project began in mid-2001, we at L&I believed that we (and our customers) were investing too much time and money on unnecessary phone calls, follow-up letters, and, perhaps, litigation.

REWRITE 100 FORM LETTERS IN A YEAR? OUR STRATEGY

We were serious about making our letters understandable, doing the work in-house, and not taking forever to do it. I had experience rewriting and testing letters in four other projects, but this project was to have a higher profile, tight deadlines, and a challenging 100 documents to revise in the course of only one year. It also involved three different, customized, automated computer systems each with its own quirks and limitations. After meeting with agency leadership, we decided on several strategies.

Focus on high-volume letters

Rather than revising all of the letters in a few programs, we decided to revise the highest volume letters in all customer service programs. We wanted all programs that served customers to be familiar with the Plain Talk movement.

Invest in top-quality training

To increase the agency's capacity for plain language revisions, we decided to train 20-25 staff members who would be responsible for the rewrites in their programs. Janice (Ginny) Redish of Redish & Associates developed a two-day course specifically for this project: "Developing Clear and Usable Letters at L&I." Trainees were chosen for their background in direct customer service, rather than their experience as writers or their detailed knowledge of policy. We wanted people who knew the customers.

Work closely with the writers

Rather than leaving our designated and newly trained writers on their own for the rest of the year, we decided to provide intensive mentoring throughout this time. Each writer (or team of writers) would meet regularly with me throughout the entire rewrite process.

Give Plain Talk high visibility

Employees were hesitant to use ordinary, everyday language in their documents unless they knew it was expected. To this end, the director made a point of frequently mentioning Plain Talk as a major agency goal in speeches and on our intranet. We planned an in-house promotion halfway through the project that would feature posters and articles on Plain Talk writers.

Get the managers on board

In addition to her work with staff, Dr. Redish provided a condensed, three-hour session about clear writing to top managers. We wanted to make sure they clearly understood what their Plain Talk writers were up to before the new drafts hit their desks. However, we also wanted to make sure revisions were made on documents chosen by the program, to solve problems they already were motivated to do something about.

Keep the costs down
We invested in excellent front-end training and a specific number of consultation hours. Our only other costs were my existing full-time position, the cost of a laptop and light box (computer projector), and the $50 honoraria we expected to pay some 30 usability participants over the course of the year.

REWRITING THE LETTERS – OUR STEP- BY- STEP APPROACH

Inventorying agency letters
I identified sixteen programs that worked regularly with outside customers. (Four were later dropped.) I then asked our agency's communications director to request form letter inventories. We soon had hard copies of all letters, as well as annual frequency-of-mailing estimates.

Choosing the letters and writers
Once we had a comprehensive look at the letters, each program picked the letters they wanted to revise. Although we focused primarily on high-volume letters, sometimes, a poorly written, low-volume letter was generating enough problems to include it. Once the letters were chosen, we began choosing staff members who would be responsible for the rewrites. We looked for "front-line" staff — people who knew the customers receiving our letters. Fortunately, we found employees who also had a good understanding of program policy. Many volunteered for this project.

Type of program	# Letters	# Writers
Injured Worker Claims	17	6
Claims (Support Services)	5	1
Claims (Self-Insured Employer)	9	4
Employer accounts	28	5
Bill processing (MIPS)	5	2
Workplace safety & health	23	5 +
Field Services	5	2
Public Disclosure	6	1
Contractor Reg. (General)	5	2 +
Contractor Reg. (Electrician)	7	2
Contractor Reg. (Plumber)	3	1
Employment Standards	6	1
Total	119	32

Setting deadlines and a system for approving the new letters
All programs were required to report in advance who was responsible for final approval of each letter. Then each letter was given a deadline. Plain Talk is on the Washington State's "Governor's Scorecard" in which progress is reported to the govenor every quarter. As we were now two months into the fiscal year, with staff training still to come, our remaining deadlines were Dec. 31, March 31 and June 30. We divided the total number of documents into thirds. Easy letters were scheduled first. Complex projects were given the most time.

Establishing an agency style
The training from Redish & Associates established that our new agency correspondence style was to be short, to the point, and make use of easy-to-read bulleted points. Moreover, a new plain language culture was already in the making. In 1999, the Washington Legislature approved approximately $1.4 million in funding to rewrite, reorganize, and put on line workplace safety and health rules. (This highly successful project was completed in September 2001.) Also many staff members had attended Dr. Redish's training in clear rule writing and usability testing. What's more, L&I Director Gary Moore was legendary for his refusal to sign the often tangled and bureaucratic letters prepared for him.

Providing ongoing staff mentoring
Regular staff follow-up and mentoring is the core of the project. We want staff to be responsible for the letters, but they need (and want) help with their writing. I use a projecting laptop computer that makes "group write" possible. It is Plain Talk's most powerful tool.

A projecting laptop works. Here's why:

- It encourages consensus: The group dynamic changes when everyone switches from looking down at paperwork to looking up at a screen. Ideas can be tried out (and discarded) instantly. The ever-changing document is viewed as a whole. There is often group ownership of the document.

- It helps staff with their writing skills: Many Plain Talk writers get the hang of writing active sentences and substituting simple words for in-house jargon because they watch it being done on the screen. Many letters are composed simply by letting staff explain something out loud while I "translate" onto the projected document.

- It saves time: Instead of leaving a meeting with an armful of drafts scribbled with notes, you leave with a completed draft on a disk that has already been approved by the group.

Conducting usability testing

In our first round, we tested 15 letters out of the 38 completed. See below for how we conducted our studies.

LESSONS LEARNED FROM REVISING LETTERS

At the time of this writing, we are halfway through the project. Staff working on Plain Talk are enthusiastic. I find that most people had stuck to the old way of writing because they thought it sounded professional or because they thought our lawyers required it. Here's what we have learned up to this point (end of January 2002 – halfway through the project).

Research programming issues upfront

All of your good work can come to a halt without good information about system limitations. Many of our form letters are generated by aging computer systems that lack basic word processing features, such as boldface and font changes. Space is always limited. It's easier to write a document to fit the computer program's allotted space than to perfect a letter only to later discover a computer program's annoying parameters. Find out first. Schedule programming time in advance.

Find out if your project can dovetail with another high-priority project

You may end up with valuable extra resources and everyone will benefit. For example, Plain Talk was in a position to provide clear writing and design services for two new workplace safety and health computer reporting systems. It also piggy-backed on the agency's first steps toward on-line registration for construction contractors.

Communicate with the attorneys early

Let them know right away about your project. Often, you will require their sign-off, even if it's not immediately apparent there's a legal issue. They may have valuable advice before you get started on drafts.

Be very organized

A project like this involves many drafts, many meetings and many people. I developed a "tracking sheet" for each program that lists all important information, such as deadlines, computer systems, writers, sign-off managers, and developments. (Later, executive management used this sheet to make programs report on new letter launch dates.)

Be flexible

You will need to make changes along the way. Sometimes, one general letter must turn into two or three more-customized letters. Sometimes, a program will want to tack on related letters, so they can all be revised at once. Or they may need the letter sooner than scheduled. A writer may drop out. Halfway through the Plain Talk project, our 100 letters grew to 130. As a result, I pulled some short and uncontroversial letters and no one complained.

If you plan to measure results, set up baselines right away

In Plain Talk, it was hard to find time for setting up baselines. Also, opportunities are not always clear until you understand the document (and the program) better. Halfway through the project, we began setting up four baselines. Our efforts so far are described later in this paper.

Realize that foggy letters may reveal foggy policies

When letters are unclear, it sometimes reflects a foggy policy lurking beneath the surface. This means staff writers sometimes need more time than planned to clarify issues with management.

Get help

Plain language writers will excel at different things. For example, I do not excel at accounting matters and clear displays of numbers. So I asked a consultant to help me.

Be open to subject matter, but firm about the language

Final document sign-offs won't always come from the plain language-initiated. One of my Plain Talk writers turned in a great new letter to his supervisor, only to have the supervisor reverse it back into bureaucratese. Fortunately, the supervisor gave the writer ultimate responsibility and the letter stood.

Here are two examples of the supervisor's suggestions, which we did not use:

1.
Plain Talk version:
"This is illegal discrimination"
Supervisor's attempted rewrite:
"Reporting workplace hazards is protected."

2.
Plain Talk version:
"We are not satisfied with the employer's response"
Supervisor's attempted rewrite:
"The employer's response did not satisfy the complaint issues."

HOW WE TESTED THE LETTERS FOR USABILITY & READABILITY

Most usability testing I was familiar with involved improving web design, rules, or large documents. You give the participant a task and watch the participant do something or find something. With letters, however, I believe success is more focused on the letter itself – how well the information is organized and how clearly it is written. My inspiration had long been the “Writing for Real People” project conducted for the U.S. Department of Veterans Affairs regional offices in Jackson, Mississippi, and Little Rock, Arkansas. In that usability testing, participants read letter sections aloud and then paraphrased key sentences. We used this technique, and we also developed questions to ask participants and followed the paraphrasing and questions with informal discussions.

Creating the tests

As much as possible, I involved the program staff in creating the tests. They usually had strong opinions about what they really wanted customers to understand.

Organizing the tests

Five of the letters we chose for testing were aimed at employers. Another ten were aimed at workers. I wanted relatively inexperienced small business owners to test the employer letters. For worker-directed letters, I wanted a mix of people in jobs with a relatively high risk of injury, but with no history of filing a claim or dealing with our agency. In each group, I strove for a mix of men-women, age groups, and occupations. To make the most efficient use of our participants and time, I had each participant test five letters during the 90-minute session.

Small business letters: 5	4 small business owners each tested the 5 letters
1st group worker letters: 5	4 workers each tested the 5 Group #1 letters
2nd group worker letters: 5	4 workers each tested the 5 Group #2 letters
Total # letters tested: 15	Total # participants 12

Recruiting the usability participants

Recruitment, scheduling, and honorarium arrangements are time-consuming. So I asked for in-house help and got it. One assistant’s regular job is handling employer accounts; her access to the names and phone numbers of new small business owners was our starting point. Between my two assistants, our participants were recruited within a week from local businesses. They were tested individually in conference rooms located in our Tumwater headquarters and each was paid $50.

Facilitating the usability tests

I facilitated each 90-minute test. Two department employees, preferably from the Plain Talk team that had composed one or more of the letters, helped collect data on pre-printed and labeled sheets. During the first set of tests, we did not audio or videotape. We tested one letter at a time.

Conducting each test session

Before every session, we chatted informally with the participant and emphasized that we were “testing ourselves” rather than testing the participant's knowledge or reading ability. We also asked our participants to verbalize their thoughts as much as possible.

1. ***Scenarios***: To begin the test, I read aloud a scenario that, in the real world, would typically prompt the letter. The participant could read along on a sheet that contained the "story."

2. ***Paraphrasing***: After reading the story, the participant removed the letter from an envelope and was asked to read aloud letter sections, then “say them again in your own words.” Paraphrasing helped detect too-long sentences, unfamiliar words, and key words that went unnoticed. Data collectors wrote comments and rated the quality of the paraphrasing for each section. Code: 1 **-** Excellent paraphrasing 2 **-** Paraphrased with hesitation 3 **-** Paraphrased incorrectly.

3. ***Questions***: After paraphrasing, the participant was then asked a series of questions. Questions ranged from task-oriented, such as, "What does L&I want you to do next?" to comprehension: "Why do we need to make sure your Carpal Tunnel is due to your work activities?" Data collectors wrote down participants' answers.

4. ***Questionnaires:*** After each test, the participant rated the letter for qualities such as ease or difficulty of use. There was space on the questionnaire for comments: 1.) What they liked or did not like about the letter 2.) What was difficult to understand and why. Many participants who stumbled over a letter went on to rate it "Very Easy" or "Easy" – a sound argument for doing usability testing. Opinions aren’t as revealing as actions.

5. ***Discussion***: After testing each letter (or set of related letters), I opened the session to an informal discussion between the participant and data collectors. Often, this was the most important part of the test. Participants frequently had specific suggestions for improving a letter. They liked it that "government" wanted their opinion.

Incorporating data from usability tests
Our data from the first set of usability tests was very rich and very helpful. As the table below shows, most letters were substantially revised. Some letters needed a reorganization of material. Some needed more informative bullets. Others were missing information we assumed was understood.

Letters with no (or minor) changes	6
Letters changed and improved	8
Letters postponed for further revision	1

LESSONS LEARNED FROM USABILITY

It's ok to test "imperfect" documents
When time frames are tight, it doesn't do to spend time perfecting a document for a usability test. Usability should be a guide, not a sign-off. What participants find confusing is just as important as what they find easy. Documents can be tested mid-way through the process, or even at the beginning, before revisions are made. By waiting too long to do usability testing, I had to scramble to incorporate changes by my deadline.

Don't test too many documents
Less is sometimes better. Next time, we'll choose fewer documents. This way, we'll be able to focus on the most challenging ones.

Staff who use the documents in their work should witness the usability tests
In the rush to set up the usability tests, it wasn't always possible to have the right staff people present. Next time, we will do more advance planning so that staff with subject expertise in the letters being tested can be scheduled as data collectors.

Get plenty of logistical help
Usability tests can generate a blizzard of paperwork. In our first set of tests, we had twelve users each testing five documents. For each document, three data collectors made notes on both paraphrasing and questions. I solicited as much help as I could getting the data organized so I could evaluate it quickly.

Usability participants need to feel comfortable
The participants for our "worker" letters had to be people who had not dealt with our agency before, but who had a high on-the-job injury risk. Our participants ranged from carpenters to landscape laborers to janitors. (One participant trains horses for a living.) Our large government office building with its security badges and sterile conference rooms were out of the ordinary for most. Time needs to be allotted to break the ice.

Videotape a few sessions
Unfortunately, because we have been pressed for time, we have not yet videotaped a usability test of a letter. The agency has usability tapes of web sites that are extremely good at convincing anyone with doubts. We need wakeup calls on hand for writers, too.

MEASURING SUCCESS

Ultimately, all of us will be curious to see if our Plain Talk rewrites make a difference. Yet, this is a state agency where many other customer improvements are taking place simultaneously. In some cases, it may be hard to single out the effect of a few letters.

Yet, I see the potential for meaningful measurements in four areas. As of now baselines are being developed in two.

1. Workplace safety & health (WISHA) citations:
The reorganization and rewrite of this important package (containing some half-dozen documents) should result in a drop in calls to our busy inspectors around the state. I hope to soon begin baseline measures of phone calls.

2. Letters from L&I's Self-Insurance program:
This group created a vastly improved set of letters to injured workers seeking reconsideratoin of workers' comp decisions made by the state's large, self-insured employers. They have begun baseline measures on claim adjudicator phone calls.

3. Info. packet to farm worker contractors:
We have established a baseline on the number of errors farm worker contractors make each year when they send in their registrations.

4. Letters to citizens requesting public documents:
I hope to begin measuring an expected drop in phone calls in this program, which is doing an especially good job rewriting its documents.

BEFORE AND AFTER EXAMPLES

Here are examples from three letters rewritten during the Plain Talk project. In these excerpts, it's possible to show a direct "translation" of a paragraph into plain English. In most cases, however, documents were completely re-thought and rewritten from the ground up.

Example #1: Excerpt from a letter to a citizen requesting a document

Before:
Thank you for your public records request. Pursuant to RCW 42.1.320, we are informing you it has been received and we estimate a further response to you by mail within thirty (30) days. Although we hope to complete your request number 11_____, as soon as possible, we are making allowance for variables such as file availability, increased request demand, computer system downtime and unforeseen staff shortages. If an inspection of file information would serve your needs better than a response by mail, feel free to contact us to arrange a file inspection appointment.

After:
We received your public records request and are now searching for the materials. We will respond in 30 days to let you know:

- If the records are available
- If any of the records will be withheld for legal reasons
- If copy charges will apply and, if so, the amount.

Example #2: Excerpt from a letter to a citizen who has not cashed a benefit check

Before:
We have been notified that you did not receive a state of Washington warrant listed on the attached Affidavit of Lost or Destroyed Warrant Request for Replacement, form **F242-026-000.** The State Treasurer's Office has informed us that the warrant is outstanding and has not been cashed as of today's date.

After:
Have you cashed your L&I check yet?

The State Treasurer's office has informed us that a check we sent you has not been cashed. Review the attached legal form. It will show the amount of the check, what it was for, and the date it was issued.

Example #3: Excerpt from a letter to an attorney just hired by an injured worker (A copy is always sent to the worker)

Before:
We have received your Notice of Representation on the above claim along with your request for a copy of the Department's file for review. Enclosed in a microfiche copy of the Department's file on the above claim.

The mailing address change authorized by the claimant has been made, and all further correspondence regarding this claim will be forwarded to the claimant in care of your offices.

After:
We have received your Notice of Representation for [Name of worker]

We have enclosed a copy of this worker's claim file.

You will receive all correspondence related to this claim

The worker has authorized this mailing address change. From now on, all correspondence and any benefit checks for this worker will be sent to your office.

REFERENCES

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