INTRODUCTION

Good morning! I am Ron Wohl. I am a Certified Management Consultant. I founded one of the five original plain language consulting companies in the United States in 1977. My practice originally focused on employee benefits, compensation and human resource policy and procedure communication. Over the years, we have broadened our focus to include written communication between managers and employees, and between the business its stakeholders – investors, consumers, and business partners.

I am also a corporate applied psychological anthropologist. I take organizations apart and put them back together. I find that the item that holds all of the various parts of an organization together is the glue of communication. The clearer and more frequent and relevant that management communicates with employees at all levels, the stronger the bonds within the business.

This communication is that of **factual information**. Communicating facts requires a great deal of research and interpretation so they may be applied in the right places and interpreted by the receiver of the information in the same way it was meant to be received.

Today we are going to explore two tools to help you communicate factual information more easily and effectively. These two tools are documentation and comparison formatting.

Plain language has applications in many formats from regulations to instructions and from story telling to journalism. The job of a plain language writer is to move the information communicated from the arcane or audience inappropriate to clarity and audience appropriate. Whether writing an original communication or rewriting communications that fail the clarity test, **one of the most important tasks for the plain language writer is to keep track of where his or her information came from** – what is the basis of each statement he or she makes or clarifies. In a job that regularly requires several drafts to be reviewed either for editorial purposes or for approval, keeping track of basic information – whether background material, specific facts upon which the communication is based, or sources of information quoted in the communication – is tedious work often lost in the production, left to the end of the project, given to someone else to do (fact checking) or not done at all.

However, this process of backing up what you have to say with basic facts and sources, what I call documentation, does provide an audit trail that your reader and many others may need to know and understand to rely on your conclusions. Documentation is especially important if what you say has a life threatening consequence if relied upon or if your document is challenged in a court of law or by your client or your editor. There is nothing more embarrassing for someone who is making a presentation based on an absent author's efforts to be asked: “where did that come from?”

I spent many years as an employee benefits communication specialist, working under a US Government regulation, the Employee Retirement Income Security Act, explaining to participants and beneficiaries in employee benefit plans what their benefits were, how to use them and what they were not entitled to receive. Even though the disclosure regulations of this law are rather specific, I was required to read the original contracts and insurance policies providing the benefits. I was tasked to explain in a clear and concise manner, understandable to the average plan participant, and to make many professional decisions regarding how to interpret what lawyers, economists, actuaries, accountants and bankers had written carefully and specifically to meet my client's needs. Any misinterpretation on my part could mean an expensive challenge fought in union negotiations, in a court of law, in the US Congress or in the media; let alone between employees at the water cooler or over a cup of bitter coffee, or in the human resource office. My work not only needed to stand up for itself, but it had to do so over many years between rewrites. Additionally, if one of my associates or clients was challenged over something I wrote, my client could not just call me up and ask me where my information came from, my client needed to know himself so he could back up what he had bought from me.

Traditionally, this would mean keeping careful notes of each fact I read and creating footnotes or endnotes to explain the sources of factual information. Of course I could use the citation system we were taught as long ago as junior and senior high school, quoting the authors, the title, publisher, publication date and city, and page numbers from which I drew my facts and referring to them by curious Latin names such as my favorite, "op sit", but this required not only painstaking attribution notes and judgments about which number footnote or end note was which and deciding which style of citation I was to use, but it also took a lot of time to do, and worst of all, these citations themselves needed to be tracked from one draft to another. Page sizes were continually adjusted. Often the documentation became lost after the first draft. Usually, I was called on long after finishing an assignment to explain "**Where did that come from?**" Having written many documents that came from very similar contracts and plans, the answer of "where that came from" would blur and fade in my mind. Sweat would roll slowly down from my arms and I hoped my own obfuscating answer would sufficiently meet my client's request. My worst experience was explaining my associate's interpretations of specific passages from a client's contract and not having a clue as to where this information came from nor how to reach my associate to rescue me.

One particular instance I will always remember. I was meeting with one of our company's largest clients to go over their health and life insurance benefit handbook that I had written and their pension and 401(K) savings plan booklets that my associate (a lawyer) had written. This client was a toy company noted for creating beautiful, collectible dolls that they were known to give away to consultants whose work they liked. My seven-year-old daughter had implored me to bring her one of these expensive dolls. As I answered my client's questions quickly and with confidence about the information I had written, I could almost feel that doll becoming mine and my daughter's smile as I would give it to her after a long absence from home. Then, my client asked me question after question about the information prepared by my absent associate who was not even reachable by phone during the meeting, I felt that doll slip agonizingly through my fingers with each inappropriate guess with which I responded each time I had to say, "I'll have to get back to you on that." Needless to say, my client was not happy with my responses and I did not get that doll for my daughter.

That experience taught me a very big lesson: Find a quick and accurate means of documenting facts upon which I, or anyone for whom I needed to explain their work, relied upon.

For this process, I recalled my law school years and how each fact in a legal opinion was documented to the legal case from which it was cited through the printing of that case in the margin of the final text beside the fact used. This was known as the West Law Key System.

I needed to develop something that would encompass sources from statements in a legal document to quotes from lawyers and others who advised me about how a fact or benefit was interpreted at a specific client. What I developed thirty-one years ago has become known as the Wohl System or the **In Plain English Documentation System**©, my own proprietary process which I will explain to you here.

In this system, you assign a letter to every piece of information provided you by the client and to each interview you conduct with client approved sources. then you simply indicate the document letter, page number, section number on that page, paragraph number, line number within that paragraph and even word number(if appropriate) within that line where the fact(s) you are siting or upon which you are basing what you are writing, is based. (For example, suppose you find a fact upon which you are basing a certsain statement in document A, page 10 paragraph 3, line 5, starting at the fourth word in that paragraph. This can be cited as: A.10.3.5.4. If you find a contratdiction anywhere, you can state in your comments that one citation is in conflict with another citation and ask for clarification or declare what fact you used despite this conflict and why. For example: "A.10.3.5.4 conflicts with R.12.14.10.8. Please resolve." All this conversation will appear in the same space in a "comment" at the appropriate place in your text. In this way, you can have a conversation with your draft-reader in your absence and these comments willl follow your draft to trhe completion of the project and can remain as a personal history for your benefit if you are called upon later to justify why you wrote what you did.

As you write new drafts of your document, you assign a document letter and number to your draft and continue to use the documentation system to add (or subtract) information to your subsequent drafts. For example, your first draft and all you comments are referred to as D1.7.5.2 (the referenced is from the third line of the fifth paragraph on page 7 of the first draft).

I developed this simple system of creating an address for every word in a document (including transcripts of notes or interviews) so my writers' efforts can be represented to anyone within my clients reviewing group and for anyone who subsequently is required to read information for which my company is responsible, including lawyers, the press, the courts and historians.

REWRITING RULES

Governance of a group or a country is a process of interaction and decision-making by one or more individuals on behalf of the entire body governed.

Governance consists of rule-making, communication of the rules, and enforcement of the rules.

Governance consists of several processes:

1. Appointment of Leadership
2. Rule Making
3. Communication of Rules
4. Enforcement of Rules
5. Time
6. Reaction
7. Revision

These processes are repeated time and again, whether applicable to leading a country, or a citizens association, or a business, or a union, or a religion, or even the Plain Language Network.

Like waves washing up on the shore, the contour of the land may change, but the waves continue to wash against the shore. So do leaders who get appointed, elected or seize power and then set about making rules.

The reaction of those being ruled and the effect of time, as well as the whims of leadership, however, can change the rules. So can the communication of the rules themselves and the enforcement of the rules. Any time people interact with rules, there is a chance that a rule can change – by error, on purpose or even by lack of interest.

The challenge for an historian studying governance is to follow how rules change over time and why. The challenge for a Plain Language writer of fact-based information is to avoid becoming a changer of rules through his or her interpretation of what is on paper currently, and what the rules should be in the mind of the rule makers. In essence the writer is a filter of old rules on their way through revision – but not a rule maker. Only the vested leaders are rule makers.

So, if rules can easily be changed by lax or fierce enforcement, inadequate or improper communication, or just the force of changing events over time, the rule rewriter's major challenge is to create clarity of language within the rule itself. Revised rules must be clear, readily and equally understood wording that does not change the purpose or objective of the rule text. To do otherwise is to make new rules and the rewriter is not a rule maker. Consequently the writer must present a rule rewrite so that the rule makers can understand what remains unchanged and what must be reauthorized by the rule makers themselves.

The process I have developed incorporates the Wohl System of Documentation to provide a ready audit trail for those who must review the rewriter's product and for historians who want to trace the rise and fall of organizations, whether governments or businesses, because rules are to a government what strategies are to a business.

Slides 1 through 11

Slides 12 through 34

These are the steps in the rule rewriter’s process:

IN PLAIN ENGLISH RULE REWRITING PROCESS

1. Document old text
2. Add old text to the **Form for Rewriting**
3. Read for currency
4. Decide what to rewrite, keep or remove
5. Compare the purpose of each paragraph
6. Decide to accept as rewritten or refer for approval
7. Communicate to officials
8. Incorporate changes to text
9. Test for usability
10. Communicate to all users
11. Monitor feedback
12. Report successes and problems to officials

This is the format I have developed to ease the process of rule rewriting:

Old Address	Old Text	Purpose & Objectives	Purpose & Objectives or Reason for Change	New Text	New Address

When the purpose and objectives of the new text is transparently the same as the purpose and objectives of the old text, the rule remains unchanged and can be re-communicated as an updated language. When the purpose or objectives are different, or when the text is changed in any way to create a new purpose or objective, the resulting proposed new rule must be sent to the rule makers for discussion and authorization.

Let’s look at how this works:

1. Old Rules
2. New Draft
3. Formatted Process Chart
4. Final Draft
5. Final Draft showing documentation memory
6. Proposed Rule