



CONSORTIUM FOR CITIZENS  
WITH DISABILITIES

## Plain Language Policy

As the largest coalition of national organizations advocating for federal policy to ensure people with disabilities have the rights, personal choices and power, opportunities, and supports to live their lives and take part in all parts of life, the Consortium for Citizens with Disabilities (CCD) has the opportunity and duty to take specific actions and provide strong leadership to maximize effective use of plain language in every facet of life. CCD recognizes that taking actions to ensure that people with disabilities can understand and use what they read or hear is vital to advancing equality of opportunity and equal protection of the law. While using plain language will not eliminate all the information barriers millions face, it is a major step in the right direction.

The increased effective use of plain language is a necessary accommodation for millions of people with and without disabilities. According to the National Center for Education Statistics ([citation hyperlink](#)), one in five—or 43 million—adults in the United States either cannot read or have difficulty reading. One half of all adults in the United States do not read at an eighth-grade reading level ([citation hyperlink](#)). A majority of persons in juvenile detention facilities ([citation hyperlink](#)) and adult criminal detention facilities ([citation hyperlink](#)) are reported to have a disability and/or difficulty reading. People of all ages, races and abilities can experience difficulty reading ([citation hyperlink](#)). A person can face one or many different barriers to reading and/or understanding written or spoken language, including but not limited to: lack of access to an equal education; having one or more cognitive, communication, learning, mental, physical, sensory or other disabilities; having a primary language other than English; multiple and intersecting forms of prejudice and discrimination; and societal inequalities perpetuated by racism, ableism, and other oppressions.

Using plain language best informs all people about how government works and issues that affect their lives. Using written and spoken language most people understand is important for successful advocacy and public policy. For nearly the last half century, CCD has worked side-by-side with people with disabilities to assure their “equality of opportunity, full participation, independent living, and economic self-sufficiency”\* throughout the nation. CCD can strengthen this legacy by taking the lead in increasing the effective use of plain language, both in carrying out its advocacy and by advocating for public policy to achieve such aims.

CCD recognizes the importance of plain language within the disability movement’s commitment to “nothing about us without us” and commits to taking specific concrete

actions designed to increase the effective use of plain language by CCD and its Task Forces, and support its Task Forces in their advocacy for the universal use of plain language as an effective and reasonable communication accommodation under the Americans with Disabilities Act, Section 504, and other disability rights laws.

In pursuing these aims, CCD will take the follow actions:

- Prepare plain language versions of CCD information and outputs including but not limited to: CCD's mission statement; CCD Task Force mission states; Task Force annual reports; major testimony and action alerts; and descriptions of CCD letters and statements posted on the CCD website;
- Provide annual training to CCD Board of Directors, Task Force Co-chairs, and its members on plain language and effective communication;
- Create and share other tools for effective communication following a survey of CCD members to gather their thoughts and ideas on how to improve effective communication;
- Develop a Plain Language glossary with easy-to-understand definitions of words that CCD often uses, and make such a glossary available to all CCD task forces;
- Ensure accessibility of CCD's website, including the use of plain language;
- Explore the creation of a permanent Communications Access Task Force with the purpose of advocating for improving the use of plain language and effective communication internally within CCD; externally, advancing policy priorities to increase access to effective communication for people with disabilities; and coordinating with other CCD Task Forces to ensure each Task Force is able to advance policy priorities that impact effective communication where appropriate.
- Work with other organizations and individuals to improve the use of plain language and effective communication by all.

### ***Definitions:***

*Effective Communication* ([hyperlink here](#)): As used under the Americans with Disabilities Act and Section 504, the U.S. Department of Justice defines effective communication as communication that is "as clear and understandable to people with disabilities as it is for people who do not have disabilities." Effective communication can take many forms depending on individual differences and needs in hearing, seeing, speaking, reading, writing, or understanding.

*Plain Language* ([hyperlink here](#)): words and sentences are clear and can be understood by most people. Plain Language materials should only use the fewest words needed to make the meaning understood.

Plain language materials should be written at an average of a 6<sup>th</sup>-8<sup>th</sup> grade reading level and should define any technical or other language that might be unfamiliar; and include the same information as the original/inaccessible material.

The purpose of Plain Language when talking and writing is to:

- Help everyone understand what you are saying the first time they read or hear your words;
- Allow everyone to respond to and use your words; and
- Make information easily accessible to people with disabilities that affect their ability to read, write, and understand.\*\*

Plain Language requires the speaker or writer to,

- Consider the audience ([hyperlink here](#))
- Organize the information ([hyperlink here](#))
- Choose words carefully ([hyperlink here](#))
- Be concise ([hyperlink here](#))
- Keep language conversational ([hyperlink here](#))
- Design for easy reading ([hyperlink here](#))
- Follow web standards ([hyperlink here](#))
- Test writing assumptions ([hyperlink here](#))

Recognizing that Plain Language is not the same as Easy Read, we define Easy Read as,

*Easy Read*: Materials that are as easy to read as possible for readers with intellectual disabilities, English Language Learners, and readers with language or literacy skills that make understanding the written word difficult.

So, *Easy Read* materials are written at an average of a 4<sup>th</sup> grade reading level and include:

- Pictures, drawings and other easy to understand visual aids;
- Accessible formatting including larger font and extra white space;
- Short sentences and only a few sentences on a page; and,
- All of the same information as the original/inaccessible material.

We clarify that this proposed policy commits to the use of Plain Language, but *not* to Easy Read. We hope that over time, CCD Task Forces and member organizations are able to build the ability to increase their use of plain language, as well as Easy Read. Also, some CCD documents may still need to be translated into Easy Read, such as if that is necessary for the audience, or if a member requests that as an accommodation.

*Effective Date*: September 7, 2021

\*The Americans with Disabilities Act, Findings and purpose. See Finding 7. 42 U.S. Code § 12101.

\*\*Based on our research to date, FEMA seems to be the only federal agency that interprets plain language to be a potential necessary accommodation to ensure effective communication. Their [website](#) states that FEMA, “has a responsibility under Section 504 to ensure that all the information it provides to the public is accessible to people with disabilities. Plain language, including conceptual language and pictograms, used appropriately, will increase the effectiveness and delivery of actionable information to the public.” Summary of Desired Outcome, page 8.