WA State Plain Language for Digital Accessibility

State Principles

State of Washington employees follow Washington's **Plain Language Guidelines**. Those guidelines are the state's **principles** for Plain Language. The principles were created as a deliverable under governor **Executive Order 23-02** (EO 23-02).

The primary principles are:

- Know your audience
- Prioritize relevant information
- Use familiar terms
- Favor active voice
- Use personal pronouns
- Limit sentences and paragraphs
- Design clear pages

More details about *each* of these principles are located on the Plain Language Guidelines website.

Agency Guidelines

Part of EO 23-02 requires state agencies to adopt a Plain Language Policy. Check with your agency to find out the agency requirements.

2024 New Requirements

State of Washington took a proactive approach with many of the new requirements now in place at both the federal and state levels. In December 2024, the State's updated **Digital Accessibility Policy** and related **Digital Accessibility Standard** provided an approach that allows staff to meet the various requirements, regardless of their agency or state organization.

Many of the new state and federal requirements provide a clear standard for meeting Plain Language. The standard works within the Plain Language Guidelines at both the State and agency levels. The standard for Plain Language is based on readability score for the text, with some nuances. That is the focus of this resource.

Digital Content

Digital content is the *information* accessed, used, or stored digitally. It includes things like:

- **Conventional electronic documents**: defined by the Americans with Disabilities Act as content that is in the following electronic file formats only: Portable Document Formats ("PDFs"), word processor file formats (such as MS Word or Notebook), presentation file formats (such as MS PowerPoint), and spreadsheet file formats (such as MS Excel).

- **Web content**: content on web pages and web sites. The information that the web page or website is conveying, and not the back-end programming or coding for that web location.
- **Content in mobile applications (apps)**: content that is typically accessed through a software application that is downloaded and designed to run on mobile devices, such as smartphones and tablets.
- **Content on "closed systems" or "closed functionality"**: content existing on internal-only electronic systems, tools, or platforms, including intra-net, SharePoint Online, ACES, Barcode, kiosks, etc.
  - These are often technologies that users cannot attach an external assistive technology to that system, in order to make the content accessible.
- **Content stored in the Cloud**: content that is not stored on a hard drive, other types of local electronic systems, or on a primary server location at a business facility (also called OnPrem or On Premises).

Plain Language Requirements for Digital Content

Under the new federal and state requirements, staff are responsible to make sure their digital content meets the Plain Language requirements outlined in the **Web Content Accessibility Guidelines**, or WCAG. Most of the requirements staff will need to follow to meet the Digital Accessibility requirements in state service are at the WCAG version 2.2 Level AA standards. However, **in order to meet the State Plain Language Guidelines**, staff must follow the **WCAG 2.2 Level AAA standards**.

This standard requires that your text (or writing) that is in your digital content follows a **reading ability score that is less than a Nineth grade reading level**. That is also referred to as a readability score that is not more advanced than the lower secondary education level. Sometimes folks have heard that the standard is typically no more than grades 6 – 8 reading level, though many misunderstood that to mean that it could not be more than a readability score of 8.0, rather than the entire Eighth grade reading level. So, we've started using "**under grade 9**" to clear up that confusion.

Testing and Fixing Readability

There are specific formulas used to test the readability of text, using a reading score. Keep in mind that the reading score is about the grade level, rather than if your content makes sense for readers. Microsoft Word has this built in as a document feature, so most folks use the one in MS Word to make sure no confidential state or personal information is accidentally shared outside of the state systems and network. The one in MS Word uses the Flesch-Kincaid test, and this is one of the most common tests used nationally and internationally for checking readability. The Governor's Plain Language Guidelines site also mentions another one, but we'll focus on the Flesch-Kinkaid.

Steps for Testing Readability

1. Make sure you followed the Plain Language state and agency guidelines in drafting your materials. This should result in you having headings and/or headers which create sections for your digital content. Having those in your content will assist you in running the readability test, if your content is more than a few paragraphs in length.

2. Open a Word document.
3. If the text is not already in Word, copy-paste the text being tested into your Word document.
4. Check that you have punctuation at the end of each statement within your document. This must be a *period*, *question mark*, or *exclamation point*. Readability score testing will not perform as intended if there is not punctuation at the end. This is most often found in *headings*, *headers*, and within *lists*.
   a. If your base digital content is already in Word, it is strongly recommended that you open a separate draft Word document to run your readability testing, as you will change some of the portions of your text to conduct the readability test (such as adding punctuation where it is not typically needed or recommended).
5. Find the Home banner of your Word document and locate the "Editor" section.
   a. The Home *tab* is typically located at the top left of the banner, often in between the "File" tab (where you go to "save as") and the "Insert" tab (where you go to insert extra features into your document).
   b. The Home *banner* is where the different base functions for Word documents exist, such as font, paragraph structure, headings selections, editing, etc. exist.
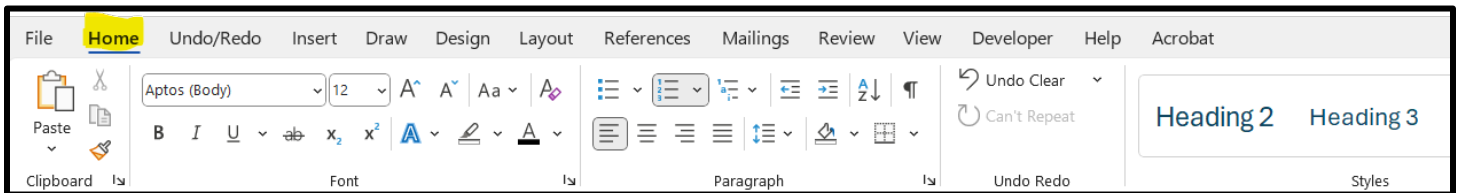

   c. The "Editor" area of the Home banner is typically at the far right of the banner, and uses an icon image of a pen with three racing stripes and the word "Editor" directly underneath. (Image provided as an alternate version):
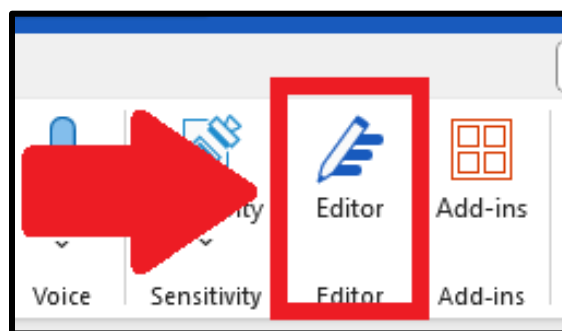

6. Select the Editor.
7. Address any of the corrections that are noted on your document, to have your editor score as close to 100% as possible.
8. Within the Editor side bar, locate the section titled, "Insights" and select, "Document stats."
9. This takes you to a pop-up asking, "We are calculating the stats for you. For very long documents, this might take a few minutes. Do you want to continue?" Select, "Ok."
   a. As reference on what Word considers as "very long documents," testing on documents that are around 30 – 100 pages in length typically take no more than just a few seconds to run.

10. You will get a pop-up that is titled, "Readability Statistics." The "Readability" section is the final one on that pop-up. The Flesch-Kinkaid Grade Level is the middle one in the "Readability" section. It displays the reading grade level of your text on the far right for that line. This is the reading score for your full document. It is a good reference point for your text's readability score. (Image provided as an alternate version):
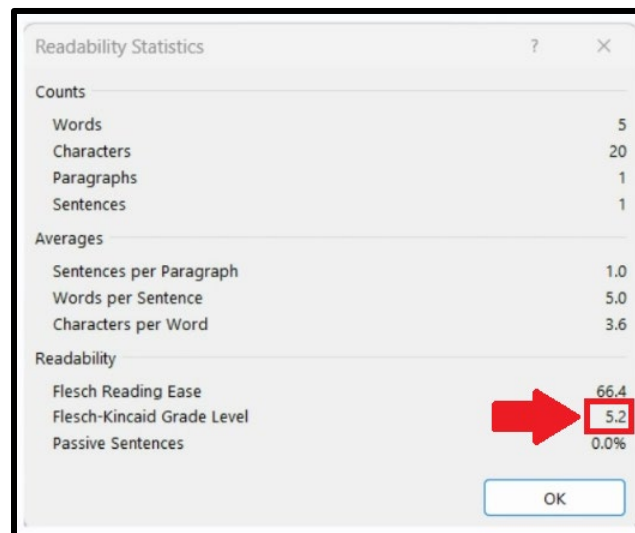
11. The reading score follows testing of your content at approximately every 100 words. Often, digital content that uses paragraphs will have over 100 words. You can find the number of words in your Word document in the first section of the Readability Statistics, under, "Counts," on the first line. If you have written your content to meet the Plain Language Guidelines, you should have a new paragraph or section typically around the 100-words mark. You can reference your document's total words to help you determine how many sections of approximately 100 words make up your document, since you will need to test each one for readability, to meet the Digital Accessibility Plain Language standards.

    a. For instance, if your document has about 2,000 words, you should have around 20 sections in your document. Each of those sections will require testing.

    b. The paragraph for step 11, before the "a." and "b." is an example of approximately 100 words (115 words).

12. With the Editor sidebar open, select the section of the document you want to test. Make sure that the punctuation is included for your selection (noted in step 4 as *period*, *question mark*, or *exclamation point*).

13. Select "Document stats" within Editor. This will test only the section of your document you have selected.

    a. Use the Words Count of your selection to make sure it is approximately 100 words. If you have selected substantially more than 100 words, you will need to use a smaller selection. It is also a good indication you need to break up that content into additional paragraphs than you originally used.

    b. If you select a section of the document and open Editor after that section is selected, note that MS Word provides the document stats for the entire document. It will not test only the

section you have selected. You must run the "Document stats" a second time in order for it to test solely the section you have selected.
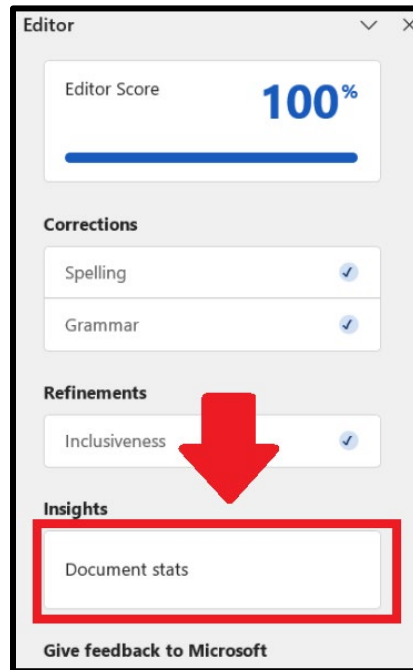
14. Testing readability score for each of your digital content sections is best done using that copied Word document, rather than the original. If any section does not meet a reading score of less than 9th grade reading level, the next section of steps apply.
   a. If all of your sections meet a reading score of less than 9th grade reading level, then Congratulations! You are done testing for Plain Language to meet digital accessibility requirements!

Steps for Fixing Readability to meet Plain Language

Only apply these steps if you followed the 14 Steps for Testing Readability and you still have sections of your digital content that do not meet a readability score of less than 9th grade reading level.

15. Double-check that you followed the **Plain Language Guidelines** for the **State** and for your agency.
16. Check that **acronyms** are spelled in full before they are used.
   a. Digital Accessibility Plain Language best practices for digital content of more than a few paragraphs: Spell an acronym in full the first time it is used in each primary section of your digital content (e.g., "Department of Enterprise Services (DES)" is used the first time the DES acronym is used, for each primary section of your content).
      i. Primary sections are generally the text within a Heading1 or 2 area, for digital content using heading levels 1, 2, 3, or 4 / through Heading4.
         1. Digital content that is brief enough to not require any heading level should be considered the same as content which is entirely within a Heading1.
      ii. Digital content should never use more than six heading levels. This is because some assistive technologies for accessibility do not process heading levels over six (e.g., Heading7, Heading8, etc.). This also aligns with WCAG Digital Accessibility standards.

      iii. Digital content which uses five or six heading levels (i.e., Heading5, Heading6) should consider primary sections as those which use Heading1, Heading2, or Heading3 within the document.

17. On the draft Word document that is a copy of your digital content, locate all **proper nouns**. Proper nouns are the nouns which are the name of a person, place, or organization. This includes state agency, division, etc. names. Proper nouns cannot be changed, so are not counted towards readability scores.
    a. Shift all proper nouns to a simple noun, such as "thing."

18. Locate **all words and terms that are needed to understand context**. These are words or terms that cannot be simplified without losing some or all of the meaning (e.g., accessibility, reasonable accommodation, diversity, inclusion, etc.).
    a. Shift all words or terms that are critical to understanding the meaning of your content to a simple, single noun, such as "thing."
    b. NOTE: Use of idioms and jargon should get replaced with Plain Language on your original digital content. Those are *not* terms or phrases that should use the simple noun replacement on your draft copy in Word for your readability testing.
        i. **Idioms** are phrases that mean something different than those words combined are meant to convey. They are the phrases that do not translate when shared with someone outside of that group. For instance, "We're on the same page" is not referring to a book. These are areas that need to get simplified to meet Plain Language standards and should not be considered as words or terms that are needed to understand context.
        ii. **Jargon** are technical terms that use a large number of words, complex words, or outdated language to express an idea that can be shared simply. These terms often send a message of superiority or being "better than" another person. Many "business formal" phrases are actually jargon. Terms like, "To whom it may concern," "with reference to," "whereas," "until such time as," "implement," etc. are all examples of jargon. Phrases using "Olde English" are typically areas of jargon.
            1. Jargon used that is unique to an agency, division, or group of specialists is also jargon that needs to be switched to Plain Language. This kind of jargon is also sometime called, "business buzzwords."
        iii. It can help to think of the terms and phrases that someone new to your group or to State of Washington employment cannot understand. If the term is not a proper noun and is not a term that is critical for understanding context, those are areas that you need to simplify to meet Digital Accessibility Plain Language. Typically, if there are other ways to describe the idea that use simpler language, and you need to simplify to meet the readability score requirements, target those areas.

19. Review any remaining words to locate **words that use three or more syllables**. On your draft Word document, adjust each of these to a simpler word or phrase with the same meaning (e.g., "thing").

20. Review any **sentences where three or more items are listed**. Shift these to either a bulleted or a numbered / alphabetized list. These areas should also get shifted on your original digital content.

a. Bullets should be used when the order of the things on the list does not change the purpose or meaning. This is also called an "unordered list."

b. Numbers or alphabetical (alphabetized) ordered lists should be used when the order does matter for understanding the purpose or meaning, such as steps in a process. This is also called an "ordered list."

c. On your draft copy in Word, make sure you use one of the punctuation marks (a *period*, *question mark*, or *exclamation point*) at the end of each list item. This is necessary for testing the readability score.

d. **NOTE** for your Original Digital Content: Digital Accessibility Plain Language **punctuation of lists** determines what punctuation is used and when. This should get applied on your original digital content.

    i. If a list of items are each standalone statements or complete sentences, then proper punctuation should be used at the end of each list item (a *period*, *question mark*, or *exclamation point*). This list item ("i.") is an example of when this is applied.

    ii. Proper punctuation should also be used at the end of each list item when a list of items can each be read as a complete, standalone sentence when it is *combined* with the list's introductory text (i.e., text often indicated by use of a colon (":")). The following is an example.

        Bobby said they like:

- Apples.
- Bananas.
- Oranges.

    iii. Lists that require the full list of items to be considered a sentence should only have punctuation at the end of the final item. The following is an example.

        Bobby said they like:

        a. Apples, or
        b. Bananas,
        c. Oranges, and
        d. Grapes.

    iv. Lists typically do *not* include end punctuation when the list is not part of a sentence, and it is also not a standalone statement. The following is an example.

        Agenda Topics

        a. Welcome
        b. Introductions
        c. Progress Check Ins
        d. Good of the Order
        e. Close

21. Review any **sentences that use more than 15 – 18 words**, using your draft copy in Word. You can find the "Words per Sentence" in your "Document stats" Readability Statistics section titled, "Averages." These often need to get shifted to shorter statements (e.g., as list items, as multiple sentences, etc.).

a. Testing for sentence length is recommended to get done using your draft Word document. This allows you to count any proper nouns or terms needed for understanding context as one word. For instance, names of state agencies are often three or more words and are all proper nouns. Those agency names should count as a single word when testing sentence length.

22. Re-test the reading score for each section of your draft copy in Word. If all of your sections meet a reading score of less than 9th grade reading level, then Congratulations! You are done testing for Plain Language to meet digital accessibility requirements!

a. If you do not meet the readability score, **repeat the steps**. If you made your content as Plain as you can, **ask someone else to read it**. Most of the time, review by a second person will lead to new ways to simplify your content.

b. Keep in mind that creating content to meet **Digital Accessibility Plain Language standards is a skill**. It often needs regular practice before you become expert in Plain writing for the accessibility standards.

Desk Reference 1-pager

Key Points for Digital Accessibility Plain Language Standards

- Readability score must be under Grade 9 reading level.
- Test readability of your content every 100 words (approximately).
- Use your "Editor" in Word to test the reading level, using the "Document stats" in Editor.
- Copy your content into a draft document in Word for testing readability score.
- Adjust Proper Nouns and Words or Terms that are needed to understand context to a simple word like "Thing." Do this in your draft copy in Word.
- Simplify words to less than three syllables.
- Keep sentences to less than 15 – 18 words.
- Check that acronyms are spelled out the first time they appear in the content's primary sections.

Exceptions to Readability Score

The Digital Accessibility Plain Language standards provide a few exceptions to what gets tested for readability. These are also covered in the "fixing readability" steps section of this document.

- **Proper Nouns**: Nouns which are the name of a person, place, or organization.
  - This includes state agency, division, etc. names.
- **Words** or **terms** that are **needed to understand context**.

Content Areas to Check and Fix

Checklist of key areas to check in your content and fix for meeting Digital Accessibility Plain Language standards:

- Not following Plain Language Guidelines for the **State** and for your agency
- Acronyms
- Idioms: Phrases that mean something different than those words combined are meant to convey
- Jargon: Technical terms that use a large number of words, complex words, or outdated language to express an idea that can be shared simply
- Words using three or more syllables
- Sentences where three or more items are listed
- Sentences that use more than 15 – 18 words
  - Proper nouns that use more than one word: Test as only one word (e.g., First and Last Name of a person = 1 word; Name of a state agency = 1 word)
  - Terms that are critical to understanding context: Test as only one word (e.g., Reasonable Accommodation = 1 word)