Finance, plain and simple: A comparative textual analysis of plain language use in external communications from American and French central banks

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FINANCE, PLAIN AND SIMPLE: A COMPARATIVE TEXTUAL ANALYSIS OF PLAIN LANGUAGE USE IN EXTERNAL COMMUNICATIONS FROM AMERICAN AND FRENCH CENTRAL BANKS

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INTRODUCTION

In the wake of financial crises and times of uncertainty, transparent and accessible communication has recently become a key part of central banking in the U.S. and in the Eurosystem. This move towards clear communication reflects a philosophical and stylistic tradition with deep roots in the Anglosphere, known today as the plain language movement (Bennett, 2019; Schriver, 2017). Both the Federal Reserve (the Fed) and the Banque de France have adopted plain language as a part of their communication strategies, joining the ranks of plain language proponents in fields such as law, government and academia (Adler, 2012; Herbert et al., 2023). However, seen in a wider historical scope, plain English is a more firmly established norm compared to plain French, which began gaining traction more recently.

In the following, I will examine how the Fed and the Banque de France apply plain writing guidelines in their communications with the public, using two analogous text samples taken from the banks' consumer-oriented economic bulletins. Through this cross-linguistic case study, I aim to identify potential patterns in plain language use within each text, and, in turn, explore whether these reflect the linguistic, historical and cultural contexts in which the texts were produced. I will then consider the implications of these trends for translators working between English and French, both in the financial field and more broadly.

LITERATURE REVIEW

Defining plain language

With the increasingly wide reach of the plain language movement, different perceptions of what plain language *is* have emerged. James (2009) outlines the three main approaches to delimiting the term. From the process-oriented perspective, plain language is defined by the stylistics involved in writing plainly, such as structural, sentence-level and word-level choices. This definition can be extended beyond the words on the page to include the layout, graphics and typography, which places plain language in the broader realm of information design (Schriver, 2017). Others take a results-oriented approach, focusing on whether the content is ultimately useful, understandable and instructive to the target audience. Schriver (2017) proposes one such definition – "plain-language communications are … explicitly designed to help people negotiate situations in which communications can help them achieve a goal" (p. 345). A third approach defines plain language simply as readable language, evaluated in terms of reading speed, retention and other cognitive measures (James, 2009).

Importantly, the results-oriented approach implies that plain language is relative and context-dependent. As Adler (2012) writes, "text that will be plain for one audience will not be plain for another" (p. 68). In other words, applying the same set of principles indiscriminately does not necessarily produce a text that the target audience would consider plain, not to mention effective, communication. This holds especially true for specialized fields, where the field-specific jargon may be inherently difficult to grasp for outsiders. Adler thus argues that plain language does not always equal simple language. Instead, plain language is language that adapts to the intended audience, and that can be understood "with as little effort as the complexity of the subject permits" (Adler, 2012, p.

68). In a similar vein, Schriver (2014) distinguishes between universal and conditional plain writing principles. Universal principles are said to apply to most cases, while conditional principles are context-specific. As an example, using familiar high-frequency words to improve readability is a universal principle. For some groups, however, low-frequency words are a natural part of the jargon – even in plain writing – making their use a conditional principle (Schriver, 2014). Evidently, conditional principles can be in direct conflict with universal principles. Schriver (2014) recommends that when communicating with the public, specialists should switch from field-specific conditional principles to universal principles. This underlines the point that even though some writing principles are generally accepted as plain, specialized plain language varies according to the communication norms at play within the field. In turn, the choice between universal and conditional principles depends on the target audience.

To strike a balance between the main approaches to defining plain language, James (2009) suggests a combined focus on both process and outcome. He cites a definition from the Australian Plain English Foundation (of which he is a co-founder): "Plain language communication adapts and tests the content, structure, expression and document design of a text so that its audience can achieve intended outcomes" (James, 2009, p. 35). Because this definition includes both perspectives, it will be used as a jumping-off point for evaluating the text samples under review in this thesis. The conditional principles that apply to plain financial language will be presented in detail in the methodology chapter.

Plain language in the Anglosphere

The plain language movement traces back to the 16th century and the Reformation, which brought an epistemological shift towards plainness and transparency over “excessive ornamentation” (Bennett, 2019, p. 697). Plainness became a Protestant ideal, shaping not only the language of sermons, but also the architectural and decorative style of churches. Bennett (2019) points to the parallel of stained glass windows being replaced with clear panes as the clergy began to adopt a plain writing style; both were means of illuminating the perceived obscurities of Catholicism. Similarly, the Scientific Revolution sought to reveal objective truths through the empirical method and a “minimalistic prose style” (Bennett, 2019, p. 699). Transparency was thus becoming an ideal in both religion and science.

At the same time, 16th and 17th century England saw the rise of an anti-Latinate movement. Nativists, who were in opposition to the traditional Latinists, pushed to reject French and other Latinate loans for a return to the Anglo-Saxon roots of the English language. The idea of preserving the nation’s authenticity through language was driven forward by Romantic philology in the early 19th century. Rooted in German philosopher Johan Gottfried Herder’s concept of *Volksstimme* – “the voice of the people” – Romantic philology looked to historical linguistics and folk tales to uncover the national language in its purest form, free from loanwords and other foreignisms. English philologists began searching for a linguistically “pure” version of the language. Soon, Plain English became a symbol of national pride, morality, and the emotional connection between a speaker and their words (Bennett, 2019).

Mass literacy and the popularization of newspapers and magazines also played a part, giving rise to what Bennett (2019) calls “a culture of informality” (p. 700). One example is Addison & Steele’s periodical *The Spectator*, which circulated in London in the early 18th century ("The Spectator," 2023) and aimed to “[bring] Philosophy out of Closets and Libraries, Schools and Colleges, to dwell in Clubs and Assemblies, at Teatables, and in Coffee-houses" (Addison, 1711). Popular media thus aligned with the plain language movement in wanting to give the public an entryway into fields that were normally reserved for the elite. As a whole, the literary and philosophical currents of the 16th to the early 19th century paved the way for plain language to grow into a more unified movement in the Anglosphere.

In the U.S., plain language began gaining traction as a policy issue during the 1940s. The 1942 Federal Reports Act was a milestone decision, as the first political move to simplify communication between businesses and government. Public discourse at the time also reflected a growing wariness of the language used in politics, legislation, public administration and advertising, among others (Schriver, 2017). For instance, Congressman Maury Maverick famously coined the term "gobbledygook" for convoluted bureaucratic language in a memo to his colleagues, imploring them to "be short and use Plain English" (Maverick, 1944). Shortly after, in 1946, Orwell's *Politics and the English Language* warned against politicians using obscure and euphemistic language to manipulate the masses. In his words, "bad writers, and especially scientific, political and sociological writers, are nearly always haunted by the notion that Latin or Greek words are grander than Saxon ones" (Orwell, 2022, p. 34), echoing the anti-Latinate movement. Unlike the anti-Latinists, however, Orwell did not argue for the "salvaging of obsolete words and turns of speech" to circumvent all Latinate forms, but rather "using the fewest and shortest words that will cover one's meaning" (Orwell, 2022, pp. 52-53). Also published in 1946, Flesch's *The Art of Plain Talk* took a scientific approach to plain language. Flesch set out to measure quantitatively how difficult a text is to read, based on sentence length and word complexity. His yardstick would come to shape the development and testing of plain language texts in the U.S. for decades to follow (Flesch, 1946; Schriver, 2017). Around the same time, plain writing manuals grew in popularity.

One influential example is Strunk and White's *The Elements of Style*, originally published in 1918 and updated in 1959, which has become a classic in the plain language literature (Schriver, 2017). Clearly, plain language held an important place in the zeitgeist of the English-speaking world by mid-century.

In the 1960s, plain language became a matter of consumer rights. American plain language advocates pushed for clear, readable contracts to ensure that consumers could understand the terms and conditions before agreeing to them. In 1978, President Carter issued Executive Orders 12044 and 12174, which specifically mentioned plain language as a solution to making regulations more cost-effective and easier to understand (Schriver, 2017). Overall, the plain language movement grew throughout the core Anglosphere in the 1970s, with similar political initiatives in Canada, Australia, New Zealand and the U.K. (Adler, 2012). President Reagan later rescinded both of Carter's executive orders in 1981, claiming that the focus should be on the costs and benefits of regulations rather than on their style. Nonetheless, influential voices in government, such as Secretary of Commerce Malcolm Baldrige, continued to advocate for plain language. In 1996, President Clinton issued Executive Order 12988, requiring government agencies to use clear language when drafting regulations. An executive memorandum titled "Plain Language in Government Writing" followed in 1998, in which Clinton tasked the heads of federal agencies with improving public accessibility to government activities. Federal employees from different agencies also banded together in 1996 to found the Plain English Network, now called the Plain Language Action and Information Network (PLAIN). PLAIN offers plain language training to government employees, as well as online information and guidelines (Schriver, 2017).

In the wake of the 2008 financial crisis, consumer rights were once again on the agenda, leading to Congress passing the Dodd-Frank Wall Street Reform and Consumer Protection Act in 2010. Dodd-Frank introduced plain language requirements for banks and other financial institutions, and, importantly, consumer testing to evaluate whether financial disclosures meet plain language standards. Another major milestone came in 2010 when President Obama signed the Plain Writing Act, which set a one-year deadline for federal agencies to begin revising their document design in line with plain language guidelines. The Act went into effect in 2011, prompting many government agencies to participate in plain language workshops and to launch their own initiatives (Schriver, 2017). Today, the plain language movement's main objectives have developed "from clarity to usability to believability" (Schriver, 2017, p. 364), adding an ethical dimension to the ways in which institutions and companies communicate with the public. Schriver (2017) notes that while there is still progress to be made, the U.S. has seen a major shift in the culture of language use overall.

Plain language in France

While the Reformation brought about plain language in Protestant countries, France saw a similar movement during the 19th century. However, this was not rooted in a religious shift, but in the Enlightenment. Educational reforms were enacted to achieve mass literacy, and as in the Anglosphere, written news media soon became accessible to a wider readership. Although these developments initially mirrored the push for plain English, a plain French movement would not manifest as clearly. In the latter half of the 20th century, French language policy mainly concerned the use of Anglicisms and, more broadly, the language's position relative to English (Vecchiato, 2022). In other words, plain style was not prescribed to the same extent in France as in the Anglosphere. This is partly due to differences in the countries' philosophical traditions. Anglophone philosophy, especially logical positivism, generally builds on the assumption that "meaning … is prior to language, which merely encodes or realises it" (Bennett, 2019, p. 694). Plain language is in turn thought to convey the underlying meaning more transparently than other writing styles. Postmodern thinkers in France, on the other hand, challenged the idea of objective truth, arguing that language does not reflect meaning, but instead creates it (Bennett, 2007). Whereas logical positivism in the Anglosphere helped boost the plain language movement into the mainstream, the philosophical climate in France was not as directly oriented towards plain style.

Nonetheless, France did have its own plain language proponents, who made efforts to streamline public communication. One early attempt was the *Centre d'enregistrement et de révision des formulaires administratifs* (CERFA), founded in 1966. It was charged with taking stock of administrative forms and documents and developing simplified templates. However, it proved difficult in practice to revise the mass of paperwork issued by different ministries, and CERFA's success was limited (Chevry, 1969). Plain language first gained widespread attention in the 1980s, with French writers discussing the state of public communication at the time (Vecchiato, 2022). For instance, Richaudeau (1978) argued that effective writing is that which considers the reader's needs, "ce qu'oublient trop souvent de nos jours certains écrivains, universitaires, journalistes français rédigeant davantage pour paraître dans le vent que pour être compris de leurs lecteurs" (p. 6). Richaudeau's observations echo many of the same ideas as the plain English movement, particularly in emphasizing how the reader perceives and ultimately uses a text.

Plain language later became a human rights issue, springing from the idea of *illettrisme* or functional illiteracy. The term, which featured in a 1995 OECD report on worldwide adult literacy, refers to people who are literate, but who struggle to understand complex specialized language (Vecchiato, 2022). Equal access to information was considered crucial for people to exercise their citizenship fully (Krieg-Planque, 2020), and there were clear problems in this regard. As Vecchiato (2022) writes, "l'illettrisme aux XX^{e} et XXI^{e} siècles finit par reproduire les dynamiques d'exclusion de l'analphabétisme au XIX^{e} siècle" (p. 160). Going into the new millennium, language policy in France thus honed in on accessibility and inclusion. The first concrete step was the 2001 founding of the *Comité d'orientation pour la simplification du langage administratif* (COSLA), which was to advise the government on adapting administrative language to different target groups. COSLA took charge in revising the most frequently used administrative documents, particularly those aimed at vulnerable groups, and developing support materials for government employees. These include a style guide, a glossary of technical terms and their plain language equivalents, and software that flags overly complex or redundant language (Krieg-Planque, 2020). Other policies focused specifically on persons with intellectual disabilities, leading to the development of FALC (*facile à lire et à comprendre*) guidelines for accessible writing in 2009 (Krieg-Planque, 2020; Vecchiato, 2022). The efforts to simplify administrative communication were part of a broader "réforme de l'État" spanning sectors such as government, healthcare and law (Krieg-Planque, 2020). A recent example is the 2016 reform of the French Civil Code, which both simplified and modernized what was considered outdated legislative language (Boyd, 2019).

Looking at the Francophone world as a whole, the plain language movement's influence is perhaps best seen in Quebec, where plain language is its own academic discipline. *Rédactologie*, or writing studies, prioritizes the user experience and trains writers in clear and effective language use. The *rédacteur professionnel* has a recognized role in the Canadian communications field, similar to the translator in Europe. However, *rédactologie* was largely underrepresented in French-speaking Europe up until recently, when the *Réseau canadien de recherches interdisciplinaires en rédactologie* founded a joint training program with the University of Aix-Marseille in France (Vecchiato, 2022). Canada first introduced plain language initiatives in the 1970s, and being a bilingual country, it naturally saw plain French, or *le style clair et simple*, develop alongside plain English. The Plain Language Institute, established in 1988, had a dedicated French division working to "harmonize the changes in style and structure of simplified documents, whether they would originally be written in French or translated from English" (Fernbach, 1997, p. 16). Overall, Canada's linguistic situation has set the stage for plain French to take root more readily than in France.

Plain language in translation

Plain language use varies across language cultures, having been shaped through decades by historical, philosophical and political waves. These differences come into play when translating into a language where plainness is an established norm from one where it is not. Venuti (2018) argues that Anglo-American cultural trends have cemented fluency as "the authoritative strategy for translating" (p. 6) into English. He defines fluent translations as those using contemporary, non-specialized, standard language – the same qualities that describe plain writing. To Venuti, conforming to plain style when translating into English is a form of domestication; it draws on the linguistic ideology that is dominant in the target culture. Meanwhile, a foreignizing translation is based on marginal ideologies, which, though accepted in the source culture, may come across as strange and inaccessible in the target. Venuti notes that domestication is to some extent unavoidable because translation, in rendering meaning from one language into another, is inherently assimilative. What sets a foreignizing translation apart is that it signals the source text's cultural particularities "through the indirect means of deviating from the dominant" (Venuti, 2018, p. xiv). Choosing to domesticate a text has ethical implications, in the sense that it upholds the dominant ideology and erases cultural particularities from the source (Venuti, 2018). In practice, this presents the dilemma of either preserving the source culture's influence or prioritizing the text's effectiveness in the target language.

French-to-English translators face this dilemma, not only because plain language is less prevalent in France, but also because of inherent linguistic differences. For example, English tends to use verb phrases to express actions and events, while French tends to use nominal expressions (Vinay & Darbelnet, 1995). Nominalizations have become more commonplace in English prose too, especially in politics and academia, but plain writing guides generally recommend against them (e.g., Pinker, 2014). Similarly, elegant variation – replacing the next instances of a word with synonyms to avoid repetition – is more prevalent in French. One type of elegant variation is elaboration, which involves using a more complex expression, often a noun phrase, to replace a simpler form, as in "assumer la responsabilité de" for "se charger de". French-to-English translators tend to reduce elaborations back to the simple form (Vinay & Darbelnet, 1995), which aligns with Pinker's (2014) advice to avoid elegant variation except where it can clear up ambiguities about the agents involved. With fundamental linguistic differences like these, a plain translation implies deviating significantly from the source text. A foreignizing translation, on the other hand, might reproduce the French grammatical and lexical forms, at the risk of being considered clunky "translatorese"

(Venuti, 2018). In reality, writes Bennett (2007), translators have little say in the choice of strategy, "for such texts are almost impossible to publish in the English-speaking world without extensive domestication" (p. 181).

It may seem as if the linguistic structures of French are inherently less plain, at least from an Anglophone perspective. Bennett (2019) is critical of this idea: "Speakers of Romance languages do not have a monosyllabic Anglo-Saxon repertoire to draw upon; they learned about the world through polysyllabic Latinate words, hence, these cannot be *inherently* more abstract or metaphorical than their Germanic equivalents" (p. 695). Put differently, what is perceived as clear and effective communication is subjective and culture-bound (Turfler, 2015). In fact, according to Bennett (2019), many cultures see plain language as reductionist and unrefined, while complex language is considered more intellectual. Critics of the plain language movement describe it as hegemonic, arguing that it fails to consider cultural orientations beyond the English-speaking world. This in turn manifests as a negative value judgment of all non-plain writing styles (Bennett, 2019; Venuti, 2018). Turfler (2015) further criticizes the movement for perpetuating a "myth of superiority", which portrays plain language as linguistically, politically and morally superior to other styles. She questions whether "one style could be so closely linked with democratic, nontotalitarian ideals" while at the same time prescribing a standard for language use (Turfler, 2015, p. 214).

Criticism against plain language tends to take a relativistic stance. From this perspective, translators should allow non-plain structures to shine through in the target text because plainness, despite being the dominant paradigm in the English-speaking world, is only one of many stylistic "truths". While it is a valid point that not all cultures favor plain language, this does not negate the fact that plain language is an effective form of communication in English. In response to Turfler's (2015) criticism, Kimble (2016) cites a series of case studies in which Anglophone readers consistently preferred the plain versions of texts. For a French-to-English translator who prioritizes function, this implies that domesticating to plain style best meets the needs and expectations of target language readers.

Plain language in finance

Finance is one of the fields that have garnered criticism for using inaccessible language. Following the 2008 financial crisis, many American consumers lost trust in financial institutions, and their mistrust can in part be linked to the use of obscure language. In a survey of American PhD holders aged 40 and up, Bosley (2014) found that inaccessible financial language provokes negative emotions. The text sample used in the study was a letter about retirement funds, directing clients to contact the sender to discuss a "minimum distribution" from their accounts. When the letter was first sent out, thousands of clients reached out to the company with questions and complaints; similarly, the participants in Bosley's study were frustrated and confused about what exactly the letter was instructing them to do. The main problems were excessive length, an unsympathetic tone, and numbers being presented in running text. When the company sent out a revised plain version, they received positive feedback and saw their revenue increase. In sum, plain language helped build the clients' trust in the company, which led them to invest more into their accounts (Bosley, 2014).

Likewise, the communication strategies used by central banks can affect consumer sentiment. Transparent communication has been shown to "shape the public's expectations, reduce uncertainty, and provide accountability for politically independent central banks" (Binder, 2017, p. 239). It is also linked to macroeconomic outcomes such as lower inflation (Glöckler & Mee, 2022) and economic growth (Sablik, 2022). However, the potential for transparent communication to succeed depends on the level of financial literacy in households, which varies according to socioeconomic status (Binder, 2017). In the past, central bank communications have mainly targeted markets, economists and news organizations (pointedly abbreviated "M.E.N"). Now, central banks face the challenge of adapting their strategy to a wide range of readers. In doing so, they tread a fine line between clarity and oversimplification. Financial writing often requires detailed explanation and field-specific terms to be accurate, and oversimplifying the message risks instilling a false sense of security about the future (Glöckler & Mee, 2022).

Historically, the Fed's communication strategy was not to communicate with the public at all. This was common in central banking because open communication was thought to counteract the effects of monetary policy. By the late 20th century, the rise of digital media and new expectations for government accountability turned the tide, and the Fed was required to issue statements on its monetary policy. However, these remained inaccessible to most of the general public (Ahdieh, 2015). Former Chairman Alan Greenspan is credited with perfecting the art of cryptic communication, so-called Fedspeak, of which he said, "Unless you are expert at it, you can't tell that I didn't say anything" (Woodford, 2013, p. 2). This was a deliberate choice to avoid turmoil and to "keep the markets guessing" (Binder, 2017, p. 239). Giving vague statements was also a way for policymakers to avoid committing themselves and future policymakers to a given course of action, should it prove unsuccessful (Sablik, 2022). The Fed's communication strategy changed significantly under Chairman Ben Bernanke. He advocated for forward guidance – public statements released after Federal Open Market Committee meetings to forecast the expected development of interest rates and the economy in general (Sablik, 2022; Woodford, 2013). In a related development, the

Securities and Exchange Commission published *A Plain English Handbook* (1998), which presented best practices for writing financial disclosures (Schriver, 2017). The shift to transparency has had an important effect on the U.S. economy, especially during and after the 2008 financial crisis (Ahdieh, 2015). The Fed's statements shape how households and companies respond to macroeconomic changes, and "people's understanding of the patterns in Fed behavior is a crucial element in the effects of the policy" (Woodford, 2013, p. 7).

The Banque de France is a part of the Eurosystem under the European Central Bank (ECB). Like the Fed, the ECB works to improve accessibility through language. Important strategies include communicating via social media and releasing visual at-a-glance statements alongside monetary policy statements. One of its main goals is to connect policy decisions to people's daily lives, and these strategies have been found to increase public trust in the ECB (Glöckler & Mee, 2022; Herbert et al., 2023). However, the euro area is highly diverse, making it challenging to build a unified communication strategy. Former ECB President Mario Draghi writes:

> This task is more complex for the ECB, however, than it was for the Bundesbank in the past or the Fed today. Building trust among the 335 million citizens of the euro area is a major communication challenge. … In all these countries, citizens' expectations are different. … We deal with this plurality by making use of the inherent advantage of having a Eurosystem of 18 national central banks – that is, having communications departments in each country that make our messages heard and understood in the local context. (Draghi, 2014)

In other words, communications within the euro zone are tailored to each locale. Still, the ECB's overarching language policy may have a ripple effect on language use in each national bank. The Banque de France, for instance, publishes online short-form articles called *Bloc-notes Éco* to inform the public about current macroeconomic events, similar to the ECB's at-a-glance statements. Overall, transparency and clarity have a place in both the Fed's and the Banque de France's communication strategies, even though the banks differ in their organization and target audience.

SCOPE AND RESEARCH QUESTIONS

Plain language has a more longstanding and influential position in the English-speaking world than in France, where it entered the mainstream more recently. This is due to the countries' historical and philosophical contexts, as well as the inherent linguistic differences between French and English. Previous research has shown that plain language improves readability, accessibility and, for finance in particular, consumer sentiment and macroeconomic outcomes. However, there is little comparative research on the use of plain financial language in French and English. To identify potential differences in whether the central banks adhere to plain language principles, the following question will guide my research:

> To what extent do the Federal Reserve and the Banque de France use plain language in their communications with the public?

If the central banks use plain writing to different extents, it bears significance for French-to-English financial translators and their choice of translation strategy. This prompts an additional research question:

> If the use of plain financial language differs between the U.S. and France, what are the implications for translators working between English and French?

METHODOLOGY

Text samples

Two text samples, one from each central bank, will serve as case studies to explore the research questions. Comparing separate source texts rather than a source and target pair gives insight into the banks' communications strategies when producing original content in their own working language. This approach also excludes the potential confounding variable of plain language use in the source text carrying over into the target; without the possibility of interference from an existing source text, the original samples are likely more representative of the culture of plain language use in each bank. Both text samples are taken from the banks' economic bulletins. Among other financial releases, the Fed publishes *Consumer & Community Context*, which covers "the financial conditions and experiences of consumers and communities, including traditionally underserved and economically vulnerable households and neighborhoods" (Board of Governors of the Federal Reserve System, 2023). Similarly, the *Bulletin de la Banque de France* is described as "un outil d'information pour tous types de lecteurs" aiming to "proposer un éclairage pédagogique afin de permettre à chacun de former son propre jugement" (Banque de France, n.d.). As the bulletins are the most immediately available to consumers online, I will be analyzing the text samples in digital format.

To ensure that the texts be as analogous as possible, I selected them based on their topic, target audience, time of publication and function. The English text sample was published in the November 2020 volume of *Consumer & Community Context* and titled "Household Finances under COVID-19: Evidence from the Survey of Household Economics and Decisionmaking" (Zabek & Larrimore, 2020). It presents and analyzes survey data on household finances, gathered in the early stages of the pandemic. The

French text sample is titled "Le suivi économique en période de Covid-19 : l'apport d'indicateurs à haute fréquence" (Coffinet et al., 2020), and was published in the September/October 2020 issue of the *Bulletin de la Banque de France*. It similarly discusses household responses to the pandemic, but considers indirect indicators, including air pollution, electricity consumption and social media content. Both bulletins take a consumer-oriented approach and have an informative function. Because the bulletins are aimed at a non-specialist audience, they should – according to Schriver's (2014) concept of universal and conditional principles – be adapted to a more universally accessible level of readability. Even though they do not impose any financial obligations or give direct advice, the texts could inform consumers' personal financial decisions, making clarity all the more important.

As the analysis of these samples constitutes a case study, the results cannot be generalized to the same extent as with results from a larger corpus of texts. However, the results may be indicative of language-specific trends in plain language use. As Schriver (2014) writes, "case studies of particular genres can shed light on strategies and heuristics for improving the effectiveness of communication for that genre" (p. 57). Differences in how the banks comply with plain writing guidelines can also indicate potential issues if the texts were to be translated. If, for instance, the French text uses plain language to a lesser extent, translating it into English might involve explicitation and other adaptations for the target text to comply with the target audience's expectations of clarity.

Measuring readability

In much of the existing plain language literature, readability is measured quantitatively using mathematical formulas. An early example is Flesch's yardstick formula, which outputs a difficulty score based on a text sample's average sentence length, number of affixes and number of personal references (i.e., names, personal pronouns and nouns describing people and relationships). The difficulty scores map onto a range from very easy to very difficult, and each tier has a recommended audience in terms of completed years of education from 4th grade to college (Flesch, 1946). Flesch's formula was later adapted to output the reader's grade level directly. Known as the Flesch-Kincaid readability formula, this version was used by the U.S. military in the 1970s to assess texts issued to new recruits (Schriver, 2017). Another widely used measure is the Fog Index, which, similarly to Flesch and Flesch-Kincaid, calculates a minimum education level based on sentence length and word complexity. The Fog Index defines words with three or more syllables as complex (excluding proper nouns, hyphenated words and inflected verbs where the suffix adds a third syllable) (Zhou et al., 2017) . Because these formulas allow for systematic and supposedly objective evaluations of readability, they quickly rose to popularity in government and in the private sector (Schriver, 2017). However, critics have since pointed out that readability formulas are not accurate indicators of how easily readers will understand a text.

For one, readability formulas have limited validity – in other words, they may not be measuring what they are intended to measure. This is partly due to issues with operationalizing readability as a variable. Defining a readable text as one that has a high readability score is circular reasoning and does little to consider the reader's experience. Without a clear definition, it becomes difficult to ascertain whether the formulas reflect the cognitive processes involved in reading comprehension (Jones & Shoemaker, 1994, as cited in Loughran & McDonald, 2016). Different readability formulas also tend to produce inconsistent scores for the same text sample (Schriver, 2017), suggesting that they are not measuring the same variable. For instance, the definition of a sentence varies between formulas and is often unspecified. Online readability tools are especially unreliable because their parsing criteria are vague, failing to account for complex punctuation and other variations beyond basic sentence structures (Zhou et al., 2017). For texts containing lists, figures and abbreviations, as financial texts often do, these parsing errors lead to inaccurate scores (Loughran & McDonald, 2016). Finally, a particularly telling observation is the fact that reordering words at random within the sentences does not change the readability score, despite the text being completely incoherent (Jones & Shoemaker, 1994, as cited in Loughran & McDonald, 2016). This underlines the importance of considering the document narrative, that is, the sequence of words as well as their coherence and cohesion (Loughran & McDonald, 2016).

For business and financial texts specifically, readability formulas are problematic because they fail to account for the field-specific style. For example, many financial terms are polysyllabic but not necessarily difficult to understand in context (Loughran & McDonald, 2016). The parameters of a readable financial text also depend on the target audience, who are in many cases familiar with financial jargon. As Loughran and McDonald (2016) write, “the point of readability in this context is not trying to make financial disclosures readable at the lowest possible grade level” (p. 1197). Instead, a readable financial text is one that can be understood by the intended readership, be it household investors or analysts. This relates back to Schriver’s (2014) concept of universal and conditional plain writing principles. While shorter words are generally easier to grasp, complex words can be just as easily understood if they have a high frequency of use within the field in question. In fact, Loughran and McDonald (2014) find that few of the polysyllabic words used in financial texts “are ones that an average reader would stumble over” (p. 1645). Examples of frequently used polysyllabic words include “corporation” and “agreement,” of which most adult readers can grasp the essential meaning without having highly specialized financial knowledge (Loughran & McDonald, 2014). Word length also correlates with information content, meaning that polysyllabic words are often more semantically informative than shorter words (Piantadosi et al., 2011). This implies that in specialized fields like finance, word length does not hinder reading comprehension. Rather, field-specific terms, which tend to be polysyllabic, can be used to present information clearly and concisely, given that the term is familiar to the target audience.

Clearly, traditional readability formulas are unreliable when it comes to drawing conclusions about readability, particularly in specialized fields. Nonetheless, they can be useful as "quick benchmarks of word and sentence length" (Schriver, 2017, p. 353). As my research is based on a comparison between two texts, a statistical overview of each text would be an effective lead-in to a more comprehensive textual analysis. The average sentence length also reflects the level of concision, which is a major point where Anglophone and Francophone traditions diverge; English generally has a tighter economy of expression than French does, in the sense that the lexical and syntactic structures of English allow for a more concise form (Vinay & Darbelnet, 1995). Since concision is a staple of most plain writing guidelines, this point merits further discussion. I will thus collect quantitative data on the average sentence length and word complexity as an initial measure of concision. I will not, however, be inferring the level of education needed to understand the texts from this data, nor will I use it to conclude that one text is more readable than the other.

My main approach will be a comparative textual analysis. The comparison will follow a thematic structure, based on Loughran and McDonald's (2016) approach to analyzing document narratives. The authors propose a hierarchical analysis, moving from the lexical level to collocation, syntax, semantics, pragmatics and discourse. Table 1 presents each level of analysis. The advantage of this approach is that it "move[s] beyond assuming words occur as independent units" (Loughran & McDonald, 2016, p. 1190). Instead, by analyzing the flow of information and the relationships between words, it can give insight into how a reader might perceive the narrative as a whole.

Table 1

Analysis of Document Narratives

Level of analysis	Method
Lexical	Parsing the document's characters into chunks of words or meaningful tokens.
Collocation	Deriving meaning from a word's collocation with other words.
Syntax	Examining the grammatical structure of the sentence.
Semantics	Inferring meaning within the context of the sentence.
Pragmatics	Inferring meaning from information immediately preceding and following the sentence, as well as external knowledge.
Discourse	Deriving meaning from the collective document.

Note. Source: Loughran and McDonald (2016, pp. 1212-1213).

To expand on this method, I will be benchmarking my findings against the plain writing guidelines applicable to each text's context of publication. Checking each text's compliance with field and language-specific standards can indicate how plain financial language presents itself in each linguistic situation, which ties back to the diverging traditions of plain language use in the U.S. and in France.

While the Fed has not issued its own plain writing guidelines, the SEC's *A Plain English Handbook* has had a substantial influence in developing plain financial language in the U.S. (Schriver, 2017). Because of this influence – and because the SEC's guidelines correspond with other, more universal plain English principles (e.g., Pinker, 2014) – I will be using *A Plain English Handbook* as a standard of comparison. It makes the following recommendations:

1. Use the active voice with strong verbs.
   1.1 Don't ban the passive voice, use it sparingly.
   1.2 Find hidden verbs.
2. Try personal pronouns.
3. Bring abstractions down to earth.
4. Omit superfluous words.
5. Write in the "positive".
6. Use short sentences.
   6.1 Replace jargon and legalese with short, common words.
   6.2 Choose the simpler synonym.
   6.3 Keep the subject, verb, and object close together.
   6.4 Write using "if-then" conditionals.
   6.5 Keep your sentence structure parallel.
   6.6 Steer clear of "respectively".

(Office of Investor Education and Assistance, 1998, pp. 19-35)

As the Banque de France is part of the Eurosystem, the closest applicable plain writing manual is the European Commission's *How to write clearly* booklet. The booklet was first published in 2010 following the "Fight the Fog" campaign, and has since been released in 24 official languages (European Commission, n.d.). It is important to note that the French version, *Rédiger clairement*, closely mirrors the English version. Aside from specific examples, the content is largely unchanged. In other words, the guidelines are shaped by established plain English standards, and have not been adapted specifically to the linguistic structures of French or to the larger context of stylistic norms in France. This is a central point, the implications of which I will return to in the discussion chapter. For the time being, *Rédiger clairement* will be considered the benchmark, as it is closest to being an official manual for the Banque de France. Of the ten recommendations in the booklet, the following relate specifically to stylistic choices (as opposed to the writing process, which is not as easily gauged from analyzing the published text):

4. Soyez clair et concis.
    - 4.1 Lever les ambiguïtés.
    - 4.2 Ne pas changer les mots pour une simple question de style.
    - 4.3 Utiliser la forme affirmative plutôt que la forme négative.
5. Hiérarchisez vos idées.
    - 5.1 Nommez les agents de chaque action (voir conseil n° 7) et citez ces actions dans l'ordre où elles se déroulent.
    - 5.2 N'enterrez pas d'informations importantes au milieu d'une phrase.
6. Limitez le recours inutile aux substantifs.
7. Préférez la voix active à la voix passive.
    - 7.1 Nommez le sujet.
8. Préférez le concret, évitez l'abstraction
9. Attention aux faux amis, au jargon et à l'abus d'abréviations.
    - 9.1 Évitez les faux amis.
    - 9.2 Évitez le jargon ou expliquez-le.
    - 9.3 Attention à l'abus de sigles et d'abréviations.

(European Commission, 2015)

Finally, I will consider information design, i.e., the visual presentation of the text samples. From a results-oriented perspective, information design includes the "layout, typography, color, relationship between words and pictures, and so forth" (Redish, 2000, p. 164). These aspects should ideally act as a support, aiding the reader's understanding of the textual information through visual devices (Loughran & McDonald, 2016). Intentional information design has become particularly important online, “where people have come to expect less text and more visuals” (Redish, 2000, p. 166). *A Plain English Handbook* recommends using:

1. Different font sizes or typefaces to distinguish levels in the text’s hierarchy.
2. A readable typeface and font size.
3. White space to separate blocks of text and to emphasize important points.
4. Left justified, ragged right text.
5. Line spacing that makes paragraphs “airier” and easy to read.
6. Line lengths of between 32 and 64 characters.
7. Short paragraphs.
8. Tables to clarify any information that is less accessible in narrative prose.
9. Simple, proportionate, to-scale and chronological graphs that are placed logically in relation to the text.
10. Different type weights, shading and graphics to create visual appeal in black-and-white texts.

(Office of Investor Education and Assistance, 1998, pp. 37-54)

Importantly, information design elements “should not overwhelm or distract from the legibility of your text” (Office of Investor Education and Assistance, 1998, p. 54). The balance between textual and non-textual communication will thus be an overarching theme in the comparative analysis, especially with regard to the function and necessity of the visuals.

QUANTITATIVE DATA

The quantitative data was collected from the body text of each article, excluding titles, headings, graph labels, references, footnotes, appendices and pull quotes. For the French sample, I included the shaded text box under "encadré" (see Coffinet et al., 2020, p. 3), as it contains running text. Sentences were delimited according to punctuation, with a period (or an exclamation or question mark, had that been the case) marking the end of a sentence. As an example, this compound-complex sentence, which combines several clauses and types of internal punctuation, was considered one sentence:

> Il semblerait que la contrainte physique du confinement ait dissuadé les ménages de se renseigner sur le surendettement – du moins dans un premier temps – car la durée du confinement semble avoir pesé sur les finances des ménages, notamment pour les plus vulnérables d'entre eux (baisse de revenu suite à une perte d'emploi ou une mise en chômage partiel, diminution de l'activité des non-salariés). (Coffinet et al., 2020, p. 5)

The same applies to lists where each item is a dependent clause separated by internal punctuation, such as commas or semicolons. One of the lists in the French sample (see Coffinet et al., 2020, p. 10) proved problematic because it combines dependent clauses and complete sentences within one bullet point, but still separates the bullet points using semicolons. For the sake of consistency, the sections that span two bullet points with a semicolon were defined as one sentence, while the complete sentences within a bullet point were counted individually. I defined complex words based on the Fog Index as those containing three or more syllables, except proper nouns, hyphenated words and verbs that gain a third syllable from inflection (Zhou et al., 2017). Applying the same logic, I also excluded nouns that gain a third syllable from being pluralized, such as "finances" in English. The number of sentences and complex words was counted manually to avoid the parsing errors that often occur with automated tools, and to account for the inflection criterion, which excludes certain three-syllable words. The total word count was automated using Microsoft Word, after pre-editing the text formatting to ensure that elements like end-of-line hyphenated words and French spaced punctuation were counted correctly (i.e., a hyphenated word is one word, but a semicolon separated by one space from a word is not itself a word). This proved an important step in terms of accuracy; when pasted directly into Word, the running text of the French sample totaled 3,266 words, while the edited version came to 3,092 words.

Table 2

Quantitative Data on Average Sentence Length and Word Complexity

	English sample	**French sample**
Total word count	2,130	3,092
Total no. of sentences	86	105
Average no. of words per sentence	24.77	29.45
Total no. of complex words	279	636
Average no. of complex words per 100 words	13.10	20.57

Average sentence length

As shown in Table 2, the French text sample has a greater average sentence length than the English by approximately five words per sentence (rounded up). The difference in average sentence length could relate to the inherent economy of expression that predisposes English writing to be more concise. This holds true in some cases, such as forming open compound nouns; whereas this is relatively straightforward in English, French requires prepositions to tie the nouns together, thereby adding to the word count. Compare, for instance, “crise de la Covid-19” (Coffinet et al., 2020, p. 1) versus “COVID-19 pandemic” (Zabek & Larrimore, 2020, p. 2). However, the longest sentences in the French sample are not long mainly due to grammatical constraints, but rather due to the number of clauses per sentence. To illustrate, the following sentence, consisting of a chain of independent clauses, totals 72 words:

> Ces indicateurs sont, en outre, disponibles pour un grand nombre de pays : les données *Google Mobility* et *Google Trend* le sont pour presque tous les pays, le trafic aérien couvre les grands pays, la consommation électrique par heure est disponible pour la plupart des pays avancés, la pollution de l'air l'est pour 380 villes de pays émergents et avancés et les données Airbnb le sont pour toutes les grandes destinations touristiques mondiales. (Coffinet et al., 2020, p. 8)

Because the independent clauses following the colon are connected by commas, the reader may interpret the list as a run-on sentence until they reach the "et" before the final clause. This could hinder readability, as the syntactic structure first becomes clear near the end of the sentence. Presenting each clause as a standalone sentence would significantly reduce the average sentence length in this section. Another option for clarity is to list the clauses using bullet points, which the French sample does successfully in other parts of the text.

Internal punctuation is used more liberally in the French sample than in the English, making it possible to construct longer sentences with several independent clauses. In running text, the English sample contains 4 em dashes and no colons or semi-colons, whereas the French contains 7 semicolons, 11 colons and 11 en dashes. Punctuation use varies according to preference and house style, but there are also language-wide differences. Vinay and Darbelnet (1995) describes French as a tightly knit language that relies on connectors, including internal punctuation, to explicate the relationships between events and ideas. In other words, the combination of clauses in the French sample conforms to the norms of language use. In English, on the other hand, the same clauses would likely be presented as separate sentences.

Rédiger clairement recommends an average of 20 words per sentence as the ideal (European Commission, 2015). Although the French text sample exceeds this number, it should be noted that the English version of the manual recommends the same average sentence length, which does not seem an accurate reflection of the structural and stylistic differences between the two languages. Prescribing a set average length also creates a somewhat artificial limit, when actual language use attests that longer sentences are not necessarily difficult to follow as long as the flow of information is clear. Likewise, a shorter average sentence length does not guarantee readability; the content is equally important. Beyond short sentences, *A Plain English Handbook* emphasizes providing context and moving from general to specific information (Office of Investor Education and Assistance, 1998). Considering sentence length only in quantitative terms risks oversimplifying the issue. By focusing on the flow of information, writers may instead find a middle ground between a prescribed sentence length and unnecessarily long sentences.

Word complexity

On average, the French sample contains a higher number of complex words. As with the difference in average sentence length, this could be due to the economy of English, more specifically its lexical economy (Vinay & Darbelnet, 1995). Latinate words – which are naturally more frequently used in French, even though English has adopted many as loanwords – are typically longer than their "native" English translations (Hayes, 2016). This does not imply that the French sample necessarily contains more jargon, but it does reflect a language-wide difference in lexis between French and English. Because polysyllabic words are, in many cases, the only available alternative to express a given concept, these words have a high frequency of use in French, and are thus likely to be understood by a Francophone audience. As with prescribing a set sentence length, reducing the measure of word complexity to the syllable count alone is not necessarily an accurate indicator of readability.

Quantitative data in context

Although the quantitative data is indicative of the degree of concision and lexical complexity in each text, fully understanding the texts' plain language use requires an in-context view of these variables. The following passage from the English sample illustrates the point that quantitative readability measures do not convey the whole picture:

> While our measure of household financial well-being was only somewhat lower (72 percent) among all households in 2020, it was much lower among respondents who had an employment disruption—losing a job or having hours cut. Only 51 percent of respondents who had employment disruptions said they were either doing okay or living comfortably in April. By contrast, 76 percent of respondents who had not experienced employment disruptions (either because they were working the same hours or were not working before the pandemic) said that they were doing at least okay financially. These respondents without an employment disruption reported similar well-being to that seen in October 2019. (Zabek & Larrimore, 2020, p. 5)

With an average sentence length of 26.75 words and a total of 18 complex words (or 16.82 per 100 words), this passage would be classified as relatively difficult to read from a purely quantitative approach. However, a qualitative approach, based on an in-depth textual analysis that considers the context and audience expectations, suggests the contrary. For instance, the average sentence length does not account for punctuation use. The two longest sentences both use internal punctuation – parentheses and an em dash in the first, parentheses in the second – to separate additional information from the main point. In other words, the sentence length does not significantly hinder readability, as the information is presented clearly. Measuring word complexity in terms of syllable count also borders on oversimplification. First, some three-syllable words, such as "comfortably" and "similar," are so frequently used in everyday language that most readers would not consider them jargon. Second, isolating the complex words ignores whether the text defines the jargon used. In this passage, the term "employment disruptions" is evidently more field-specific, but it is immediately followed by a definition, "losing a job or having hours cut." These nuances are not captured by quantitative measures alone, which underlines the importance of evaluating plain language use not just quantitatively, but also qualitatively, taking account of context.

TEXTUAL ANALYSIS

Lexical level and collocations

Both sets of guidelines recommend against using jargon in external communications. Alternatively, if there is no exact equivalent in plain language, the term should be defined at its first use (European Commission, 2015; Office of Investor Education and Assistance, 1998). The English text sample uses accessible vocabulary for the most part. For instance, a segment of the surveyed households is described as "living comfortably" or "doing okay financially" (Zabek & Larrimore, 2020, p. 5), both colloquial expressions for financial well-being. One exception is the term "employment disruptions," which is followed by an in-text definition when it first appears: "defined as a layoff or having one's hours cut" (Zabek & Larrimore, 2020, p. 2). Explicitly introducing this clause as a definition flags "employment disruptions" as a field-specific term and then guides the reader to understand its concrete meaning. Later in the text, "job losses" and "layoffs" are used to describe one aspect of the same term. While these could be interpreted as synonymous with "employment disruptions" at first glance, the preceding definition makes it clear that they are hyponyms, as "employment disruptions" encompass not only layoffs but also hour cuts. Defining the term at the outset clarifies its connection to other terms. In this case, the related terms – "job losses" and "layoffs" – are more commonly used in everyday speech, and the definition thus helps distinguish the nuances of the term and its intended meaning.

Similarly, the French sample clearly flags and explains field-specific terms. When outlining the statistical methods used, for instance, it presents the types of data as "données dites « ouvertes » (pollution, consommation d'électricité, *Google Trend*, Twitter)" (Coffinet et al., 2020, p. 1) and "données à haute fréquence – c'est-à-dire à publication hebdomadaire ou journalière" (Coffinet et al., 2020, p. 2). Signposting using "dites" and quotation marks around the term effectively tells the reader that the word may be unfamiliar to them. As in the English sample, the definition is then explicitly introduced. The first example uses parentheses to set the definition apart, while the second uses "c'est-à-dire" as a marker. Another example is the reference to "pollution au dioxide d'azote (NO_2 : un gaz produit par la combustion d'énergies fossils par l'industrie et le transport)" (Coffinet et al., 2020, p. 8). Presenting the definition in parentheses carries the risk of the reader overlooking it, but on the other hand, it allows readers who are already familiar with the term to skip ahead. In-text definitions are also more immediately accessible than footnotes or a glossary, as the reader can maintain the same focal point rather than diverting their attention to other parts of the document. As another option for defining terms, *Rédiger clairement* suggests glossaries or hyperlinks to online resources, which would be suitable in cases where the definition's length would disrupt the flow of the text. The French sample combines both approaches, defining the statistical terms in more detail in a text box and in the appendix (see Coffinet et al., 2020, pp. 3, 13).

The guidelines also recommend against the gratuitous use of abbreviations, especially where the proper noun being abbreviated is unclear. When a shortened form is needed for the sake of concision, *A Plain English Handbook* suggests choosing a word with an intuitive and logical link to the original term, so as not to overwhelm the reader with new vocabulary (Office of Investor Education and Assistance, 1998). The most-used abbreviation in the English sample is "SHED," short for the "Survey of Household Economics and Decisionmaking." Replacing it with a generalized short form, such as "the survey," would be problematic in this case because the text also references two supplemental surveys. In other words, the abbreviation may be the better option, especially since it is clearly linked to the full proper name in the introduction: "The supplements built off the Survey of Household Economics and Decisionmaking (SHED), typically an annual survey focused on everyday household finances" (Zabek & Larrimore, 2020, p. 2). *Rédiger clairement* recommends using the full proper noun if it appears only once or twice in the document. If it appears more frequently, it should be spelled out once with the abbreviation in parentheses, or defined in an attached glossary or via a hyperlink (European Commission, 2015). The French sample uses parentheses for shorter definitions, such as "le « PGE » (prêt garanti par l'État)" (Coffinet et al., 2020, p. 6) and provides detailed explanations in the appendix. By alternating between in-text and external definitions according to the level of detail, the authors avoid overwhelming the reader with information in the body text. Both sets of guidelines note that using widely understood abbreviations is acceptable. As an example, the French text mentions "PIB" without further explicitation, such as adding "produit intérieur brut" in parentheses, as the abbreviation is likely familiar to most readers of macroeconomic reports. Naturally, the abbreviation "COVID-19" also appears in both texts without hindering readability.

The use of signposting and explicitation in both texts shows that the authors are aware that some terms are field-specific, rather than assuming that they would be familiar to the reader. Had this not been the case, it could be said that the authors were under the curse of knowledge, "a difficulty in imagining what it is like for someone else not to know something that you know" (Pinker, 2014, p. 59). According to Pinker (2014), the curse of knowledge is the main reason that specialists across different fields write inaccessible texts. When specialists assume that the reader will automatically understand what is, to them, obvious, they often neglect explaining field-specific concepts. Common pitfalls include jargon, abbreviations and technical vocabulary, which may be used so frequently within the field that they become everyday language to specialists (Pinker, 2014). *A Plain English Handbook* directly addresses this effect: "If you have been in the financial or legal industry for awhile [*sic*], it may be hard to spot jargon and legalese in your writing. Consider asking someone outside the industry to check your work for incomprehensible words" (Office of Investor Education and Assistance, 1998, p. 30). In both text samples, the authors seem mindful of the potential gaps between their own and the reader's field-specific knowledge. Although jargon and abbreviations appear occasionally in both texts – and, on a more general level, are sometimes unavoidable when describing specialized concepts – the added explanations ensure that a non-specialist reader can still grasp the information.

Syntactic level

At the syntactic level, both sets of guidelines recommend using the active voice and clearly identifying the grammatical subject (European Commission, 2015; Office of Investor Education and Assistance, 1998). The French and English text samples both keep their use of passive voice to a minimum. To illustrate, the English sample gives agency to the researchers in the introduction:

> As concerns about COVID-19 led states to shut down their economies at the start of the pandemic, *a team of researchers at the Federal Reserve Board set out to measure* [emphasis added] the impacts on household finances by conducting supplemental surveys in early April and late July 2020. (Zabek & Larrimore, 2020, p. 2)

This is an example where one might have buried the subject by saying that "the impacts on household finances *were measured* by conducting supplemental surveys." However, readers generally understand active constructions more quickly because these mirror the order in which we process information (Office of Investor Education and Assistance, 1998). Similarly, the French sample gives the sender, the Banque de France, an active role: "*la Banque de France a conçu* [emphasis added] des tableaux de bord réguliers qui rassemblent les indicateurs issus des données ouvertes" (Coffinet et al., 2020, p. 1). Naming the subject clarifies the relationship between agent and action, which would otherwise have been abstract.

Despite preferring active constructions, neither *A Plain English Handbook* nor *Rédiger clairement* bans the passive voice. *A Plain English Handbook* allows it when the subject is of secondary importance, and *Rédiger clairement* notes that the subject can sometimes be inferred from context without being explicitly mentioned (European Commission, 2015; Office of Investor Education and Assistance, 1998). In the English text sample, "were laid off" and "were furloughed" (Zabek & Larrimore, 2020, p. 3) are examples of passive constructions where the agent is less central to the message; instead, the focus is on the survey respondents and their experience. On the other hand, the construction "many jobs were lost" (Zabek & Larrimore, 2020, p. 2) erases both the agent and the target of the action. This seems an unnecessary use of passive voice, as "many people lost their jobs" would be more easily processed. In the French text sample, the passive voice is used in connection with methodology, as in, "Les problématiques de comparabilité entre pays doivent également être prises en compte," and, "Bien que très utiles, les indicateurs d'activité doivent être utilisés avec certaines précautions" (Coffinet et al., 2020, pp. 3, 11). These examples, among others, could be interpreted as advising the reader on how to use the data. Although using personal pronouns is an option to render the sentences in active voice (e.g., "Vous devez prendre certaines précautions en utilisant les indicateurs"), these statements are not necessarily intended as instructions to the reader. More broadly, they describe the limitations of the method used. In other words, the subject – the person using the data – is not fixed, which arguably warrants the use of passive voice.

In addition to the active voice, *A Plain English Handbook* recommends using short sentences with a parallel structure and keeping the subject, verb and object close together. The English text sample adheres to these guidelines overall, albeit with a few exceptions. In the following sentence, the relative clause separates the subject and the verb by 30 words: "The overall number of adults who said that they would pay an unexpected $400 expense with cash, savings, or a credit card paid off at the next statement in the main survey in October 2019 was 63 percent" (Zabek & Larrimore, 2020, p. 3). The phrasing could be made clearer by leading with the percentage instead of burying it at the end of the sentence. Moving the context about the survey to an introductory prepositional phrase also contributes to shortening the main clause: "In the main survey in October 2019, 63 percent of adults said that they would pay an unexpected $400 expense with cash, savings, or a credit card paid off at the next statement." Regarding parallel structure, one sentence stood out as lacking parallelism: "Starting in April, after the first supplemental survey was fielded, most families *received* Economic Impact Payments, businesses *began to receive* Payroll Protection Program loans, and unemployed workers *began receiving* [emphasis added] enhanced unemployment insurance benefits" (Zabek & Larrimore, 2020, p. 7). The variation in verb aspect implies a slight difference in how each subject received the objects. This may be an intentional choice to mark one action as completed ("received") and another as continuing ("began to receive"). However, the gerund in the final clause ("began receiving") is semantically equivalent to the infinitive construction ("began to receive"). Either construction could thus have been repeated in the last two clauses to maintain a parallel structure.

Finally, both sets of guidelines recommend opting for verbs rather than nominalizations, as well as avoiding abstract phrasing (European Commission, 2015; Office of Investor Education and Assistance, 1998). *A Plain English Handbook* further distinguishes between strong and weak verbs. Whereas strong verbs can stand alone to express a concrete event (e.g., "decide"), weak verbs introduce nominalizations (e.g., "make a decision"). Strong verbs are often hidden within nominalizations (Office of Investor Education and Assistance, 1998). The English text sample uses strong verbs for the most part, but there is nonetheless room for improvement. As an example, compare the following two sentences, which have similar semantic contents, but where one is nominalized and the other verbalized: "Improvements in financial well-being were clearly apparent in a supplemental survey conducted in July," versus, "Other measures of family finances similarly improved between April and July" (Zabek & Larrimore, 2020, pp. 7, 8). Rewriting the first sentence as, "Financial well-being clearly improved by July," more than halves the word count and conveys the sequence of events more concretely. Another example is "implementation," which appears twice in the introduction:

> [The article] provides insight into how households fared early in the public health crisis, before the implementation of many new governmental programs. It then uses data from the second supplement to show how households were faring in late July, after the implementation of substantial assistance programs. (Zabek & Larrimore, 2020, p. 2)

Here, using nominalizations not only increases the sentence length, but also conveys a concrete event – the government introducing assistance programs – as abstract. Because there is no agent, the "implementation" seems to have occurred in a vacuum when, in reality, someone put it into action. An alternative plain language rewrite is, "before the government implemented assistance programs," which simply extracts the hidden verb from the nominalization. In the process, the rewrite clarifies the subject, making the action more concrete. The verb phrase "provides insight into" could also be shortened to "explains," replacing another noun with a strong verb. An additional issue is that "new governmental programs" and "substantial assistance programs" have the same referent, but could be interpreted as two different concepts because the wording changes. The use of elegant variation, as in this example, will be discussed further at the semantic level of analysis.

French is generally more noun-based than English, and tends to use nominalized verb phrases where English would reach for a verb. In fact, many verb forms used in contemporary French were once considered unacceptable, such as "être agréssé" replacing "être victime d'une agression" (Vinay & Darbelnet, 1995, p. 100). The French text sample shows a clear tendency towards nominalizations. Examples include "apporter un éclairage," "met[tre] en évidence," "trouv[er] une plus grande utilité" and "met[tre] à disposition" (Coffinet et al., 2020, pp. 2, 3, 8). For the sake of concision and concreteness, these could have been rendered as strong verbs, such as "éclairer," "souligner," "être plus utilisé," and "fournir," respectively. While nominalized verb phrases occur frequently in French and thus would be natural to a French reader, certain sections are particularly noun-heavy:

> Cette *baisse* rend *compte* de *l'arrêt* brutal des *activités* industrielles et commerciales et n'est pas compensée par *l'augmentation* de la *consommation* des *ménages* confinés à leur *domicile* [emphasis added]. (Coffinet et al., 2020, p. 10)

In this passage, the subject, "cette baisse," refers to a decrease in electricity use. It is followed by a verb phrase, "rend compte de," to establish a causal link. Finally, there is a long noun string, "l'augmentation de la consommation des ménages," containing two nominalizations (i.e., of the verbs "augmenter" and "consommer"). The number of nouns relative to verbs in this sentence leads to abstraction, which could hinder the reader's understanding of the events being described (European Commission, 2015). The following is one possible, less nominalized rewrite:

> La consommation d'électricité a chuté car les activités industrielles et commerciales se sont brutalement arrêtées, même si les ménages confinés à leur domicile en ont consommé plus.

Another example is, "La méconnaissance du virus a d'abord généré des comportements d'apprentissage très prononcés de la part des ménages" (Coffinet et al., 2020, p. 2). Here, the actual subject, "ménages," is buried at the end of the sentence. There are also several abstractions, such as "comportements d'apprentissage," in place of strong verbs. To give agency to the subject and convey the action concretely, this could be rewritten as, "Les ménages se sont renseignés sur le virus, qui était initialement méconnu." As these examples illustrate, the French text is more noun-heavy than the English text overall, with several cases where the nominalized verbs could be foregrounded to express the meaning more concretely. This would improve readability, at least from an Anglophone perspective, although a Francophone audience is presumably more comfortable with noun-heavy stylistics.

Semantic level

A common thread in most plain writing manuals is, in the words of Strunk and White, to omit needless words. This does not imply reducing the text to short, surface-level descriptions, but rather using precise phrasing to ensure "that every word tell" (Strunk & White, 2005, p. 39). This is echoed in *A Plain English Handbook* and *Rédiger clairement*, both of which list common phrases that can be shortened to semantic equivalents, often to single words (see European Commission, 2015, p. 6; Office of

Investor Education and Assistance, 1998, p. 25). In the English text sample, the authors have opted for the simpler word throughout, using "before" rather than "prior to" and "because" rather than "owing to the fact that," to name a few examples. Along with the relatively concise syntax, this contributes to the text's shorter average sentence length. In contrast, the French text sample occasionally uses redundant phrasing. Among the lengthy phrases listed in *Rédiger clairement*, it uses "dans le cadre de," "eu égard à" and "au sujet de" (Coffinet et al., 2020, p. 2), which could be shortened to "lors de," "pour," and "sur," respectively (European Commission, 2015, p. 6). Another example is the phrase, "Il convient cependant de noter que" (Coffinet et al., 2020, p. 3), which could simply be shortened to "cependant." In these examples, French has the economy of expression needed to form shorter equivalents, which would reduce the overall sentence length.

However, Vinay and Darbelnet (1995) note that economy is a relative concept and that "French supplements out of a desire for clarity" (p. 197). Put differently, what is considered a needless word is language-specific. While plain English guidelines equate concision with clarity, this is not necessarily the case for French, and transposing concise English forms directly into French can often result in "clumsy and heavy" constructions (Vinay & Darbelnet, 1995, p. 196). The implications of applying Anglophone standards to other languages is a point that merits further attention in the discussion chapter. In general, word choices are context-dependent and rest on a balance between oversimplifying and adding semantically empty words purely for stylistic reasons.

As mentioned in the literature review, the use of elegant variation is one of the points dividing Anglophone and Francophone traditions. French has a tendency towards elegant variation to avoid repetition, while Anglophone translators usually omit it by using the simpler synonym consistently (Vinay & Darbelnet, 1995). *Rédiger clairement* argues that alternating between different words for the same concept purely for stylistic reasons risks confusing the reader (European Commission, 2015). In the same vein, *A Plain English Handbook* recommends using the simpler synonym where possible, especially in collocation with complex words (Office of Investor Education and Assistance, 1998). Contrary to what might be expected from the differences in tradition, the French text sample adheres to this guideline while the English does not. However, this is limited to the introduction, where "many new governmental programs" and "substantial assistance programs" (Zabek & Larrimore, 2020, p. 2) are used to describe the same referent in two consecutive sentences. Later in the text, "financial assistance programs" is used consistently. This is a more concrete term compared to the "many new" and "substantial" programs described in the introduction, and would be an apt choice as the simpler synonym. Taking into account potential syntactic improvements along with semantics, the following rewrite aligns better with plain English guidelines:

<u>Original:</u>	<u>Rewrite:</u>
[The article] provides insight into how households fared early in the public health crisis, before the implementation of many new governmental programs. It then uses data from the second supplement to show how households were faring in late July, after the implementation of substantial assistance programs. (Zabek & Larrimore, 2020, p. 2)	[The article] explains how households fared early in the public health crisis, before the government began implementing financial assistance programs in late April. It then uses data from the second supplement to show how households were faring in late July.

Using the concrete term rather than vague synonyms in the introduction makes the semantic meaning immediately clear to the reader. Additionally, the rewrite eliminates the need for elegant variation by specifying that the programs were implemented from late April onwards. This information becomes clear later in the text (see Zabek & Larrimore, 2020, p. 7), but including it here avoids the repeated reference to the programs, as the reader can infer from context that the second supplement presents data from after that point. Another option, closer to the original structure, is to shorten the final clause to, "[in late July], after these programs were implemented." The demonstrative "these" makes the referent clear, again eliminating the need for elegant variation because the noun is not repeated in full. With either solution, cutting the elegant variation makes the semantic content, particularly the referent, noticeably clearer.

Both texts avoid double negatives and consistently use positive statements where possible, in line with the guidelines in both *Rédiger clairement* and *A Plain English Handbook* (European Commission, 2015; Office of Investor Education and Assistance, 1998). Because positive statements are easier to deconstruct and understand, they express the semantic content more clearly compared to their negative equivalents. Writing in the positive also goes hand in hand with omitting needless words and using the active voice to convey the information concisely (Strunk & White, 2005). *A Plain English Handbook* further touches on negative compounds that can be shortened to single words, such as "not able" to "unable" or "not certain" to "uncertain" (Office of Investor Education and Assistance, 1998, p. 27). The English text sample occasionally uses the "not able" construction, but seen in context, this serves to maintain a parallel sentence structure:

> In the main survey in October 2019, 28 percent of all adults either did not expect to pay all of their bills in full, or would not have been able to do so if they faced a $400 unexpected expense on top of their current bills. (Zabek & Larrimore, 2020, p. 8)

In this case, using "unable" would render the sentence less clear, as the negative compound follows the structure established by the first independent clause. Maintaining parallelism is particularly important due to the either/or construction. This is one example that plain writing guidelines are not absolute, but need to be considered in context and adapted to actual language use, a point that is emphasized in both *Rédiger clairement* and *A Plain English Handbook*.

Pragmatic level

Beyond word- and sentence-level choices, paragraph structure plays an important part, as the isolated information in one sentence can be defined, illustrated or substantiated by the surrounding sentences. As seen at the lexical level, clear definitions are crucial to rendering specialized communication in plain language. In addition to direct definitions of terms, the French sample uses explicitation to elaborate on certain concepts. For instance, the parenthetical aside in the following sentence clarifies the statistical data by expressing it in different words: "Pour la France, la mobilité baisse de 85% au moment du confinement (en d'autres termes, le niveau observé s'établit à 20% du niveau antérieur), vers les lieux de loisirs et de travail" (Coffinet et al., 2020, p. 8). To give an example where the surrounding sentences substantiate an argument, the English sample uses examples to strengthen central points, as in the following:

> The pattern of more layoffs among women than men is unusual, as men have been more likely to lose jobs than women in previous recessions. In the 2001 recession and the

> Great Recession, for example, men accounted for over three-quarters of employment declines. (Zabek & Larrimore, 2020, p. 4)

Seen as a whole, both text samples have intentional paragraph structures. The paragraphs are introduced using clear topic sentences, and the main takeaways are collocated, in a logical sequence, with sentences that strengthen the message being expressed. This is in line with the recommendation in *A Plain English Handbook* to move from the general to the specific within paragraphs (Office of Investor Education and Assistance, 1998), and contributes to clarifying and contextualizing the meaning.

Although the text samples effectively contextualize the information within each paragraph, some points rely on external knowledge. Vinay and Darbelnet (1995) refer to this as situational meaning, which covers both grammatical ambiguities and the larger context and purpose of the text. For instance, both of the text samples presuppose that the reader has background knowledge about the pandemic, which could perhaps be safely assumed given the time of publication. The pandemic is also a particular situation, as its global impact means that readers are likely aware of the context regardless of their language and culture. In contrast, other references are contingent on the reader and the sender sharing a national or cultural base. From a translation perspective, situational meaning becomes especially significant in these cases, as translators "have to assume the same situation to exist in the target language or to re-create a new situation suitable for the message they are conveying" (Vinay & Darbelnet, 1995, p. 168). To illustrate, the English sample mentions that "one positive sign is that relatively few responded that financial concerns were likely to keep them from seeking medical treatment" (Zabek & Larrimore, 2020, p. 7). While the surface-level meaning is clear, external knowledge about the American healthcare system adds a dimension, namely the implicit reason that this is a particularly positive outcome. In such cases, an English to French translator could supplement background information to mirror the source text's context of publication – as Vinay and Darbelnet (1995) write, "good translators do not only translate the words but the thoughts behind the words" (p. 169).

Discourse level

Both sets of guidelines emphasize structuring the text in a coherent way. According to *A Plain English Handbook*, writers should present the big picture before the details, divide the text into sections with descriptive headings, group related information together and review the flow of information through the entire text (Office of Investor Education and Assistance, 1998). *Rédiger clairement* recommends presenting events in the order in which they occur, as well as placing important information at the forefront rather than burying it mid-sentence (European Commission, 2015). Although these guidelines appear to align, Vinay and Darbelnet (1995) note that French and English traditionally take different approaches to developing discourse. French prefers rational development, in which the writer is "a spectator commenting on events" (Vinay & Darbelnet, 1995, p. 233). More specifically, rational development involves ordering events according to their causal relationships rather than chronology. English, on the other hand, leans towards intuitive or sensorial development. This entails the writer taking a neutral position, presenting the events step by step and juxtaposing elements rather than linking them explicitly (Vinay & Darbelnet, 1995). As a case in point, the English text sample is structured according to the sequence of events. The first two sections (under the subheadings "Job Losses" and "Household Financial Well-Being") describe data collected in March and early April, while the final section ("Effects of Financial Assistance Programs") presents findings from late April to July. The introduction also provides a chronological summary of the main points. In contrast, the French text sample is organized thematically according to the sources of data (i.e., "les internautes" and "des grandeurs physiques"). Each section follows an internal chronology, but seen as a whole, the discourse is structured in line with rational development.

In terms of cohesion, the use of transition words differs between the text samples. Transition words have a deictic function, linking ideas and guiding the reader through the structure of the discourse. Vinay and Darbelnet (1995) classify transition words according to their deictic function as follows:

- viewpoint connectors, which reference a coming section of the text;
- recall connectors, which reference a previous section of the text;
- linkage connectors, which link one idea with the next; and
- concluding connectors, which mark the end of a sequence of ideas.

Both text samples include viewpoint connectors in their introductions, a common approach to presenting the text's main objective to the reader. These take an identical structure: "This article presents" (Zabek & Larrimore, 2020, p. 2) and "Cet article présente" (Coffinet et al., 2020, p. 2). Both samples also use concluding connectors – "consequently" in the English and "enfin" in the French – to tie off their conclusions. Additionally, the French sample uses recall connectors, as in, "Ces indicateurs sont aussi établis sur des données en accès libre, mais, *contrairement aux deux précédents* [emphasis added], nécessitent un traitement statistique avant d'être utilisés" (Coffinet et al., 2020, p. 11). The French sample contains a greater number of linkage connectors compared to the English overall, with "ainsi," "notamment," "aussi" and "également" making particularly frequent appearances. One major difference is that the French sample marks cause-and-effect relationships more explicitly, as illustrated by its frequent use of "ainsi." In contrast, the linkage connectors in the English sample mainly have a contrastive or comparative function, such as "also," "similarly," and "however." The English sample occasionally uses causal conjunctions as well, including "consequently," "so" and "as a result," but to a much lesser extent than the French sample does. This reflects the language-wide differences between French and English when it comes to developing discourse. Whereas French relies heavily on transition words to connect ideas, English conveys these connections more implicitly, often relying on the reader to dissect them for themselves. English to French translators tend to express the implicit transition words from the source text more directly (Vinay & Darbelnet, 1995). To illustrate, this excerpt from the English sample implies a cause-and-effect link between the two sentences without using a linkage connector:

> Many households were relatively stable financially in early April, but households where people lost jobs faced financial hardships after only a few weeks. Fast-acting programs targeted at households facing income disruptions can be particularly effective at alleviating these acute financial strains among the many families who operate with thin financial buffers. (Zabek & Larrimore, 2020, p. 8)

The implicit link is that *because* these households experienced financial hardships after a short time, fast-acting programs can be particularly effective. The authors maintain cohesion by using the demonstrative in "these acute financial strains" to point back to the previous sentence. Here, an English to French translator might have added an "ainsi" in the second sentence to make the link more explicit.

In the opposite case, French to English translators tend to reduce the number of transition words in accordance with the linguistic norm (Vinay & Darbelnet, 1995). The following excerpt from the French sample is one example where the linkage connector "ainsi" could be omitted in a translation into English:

> En première approche, les ménages français ont parfaitement intégré la sévérité de la crise économique, comme l'atteste l'analyse des termes associés au chomâge partiel et aux faillites. *Ainsi* [emphasis added], selon une interpretation des mots-clés associés aux *tweets*, le chômage partiel concerne des « millions de salariés » et des « millions de personnes ». (Coffinet et al., 2020, p. 5)

Looking at the plain writing guidelines, *A Plain English Handbook* makes no specific mention of connectors. *Rédiger clairement* notes that while unnecessarily long phrases can cloud a text's readability, writers should include connectors to build cohesion. As with the principle of omitting needless words, there is a balance between under- and overusing connectors, which is bound to the language culture. Leaving links in the discourse implicit might be considered less clear from a non-Anglophone perspective; conversely, an Anglophone reader might perceive the number of connectors in a French text as excessive. However, neither norm is inherently less plain within its context, as they adhere to the established linguistic and cultural norm and, in turn, the target audience's expectations.

Information design

From an information design perspective, both texts are visually clear and accessible. For instance, they use ample white space and separate the information into short paragraphs with descriptive subheadings. The English sample has a single-column layout, while the French is split into two columns. The two-column layout is mostly clear, but the incorporation of graphics makes for some slightly awkward line breaks where the final lines of a paragraph carries over into the top of the right-side column (see Coffinet et al., 2020, pp. 5, 6). Although this does not significantly hinder readability, it illustrates the importance of balancing text and graphics, which will be discussed in further detail below. In terms of color, both samples use consistent color schemes with muted tones. Colors are used mainly to distinguish headings, pull quotes and graphics from the body text. The contrast ratio between the white background and the typeface is strong throughout, making the text easy to process visually.

In addition to visual clarity, both texts use information design to clarify and emphasize information from the body text. In the French sample, shaded text boxes give in-depth definitions of terms and snapshots of data, and bullet points are used to split detailed information into digestible sections. The English sample emphasizes parts of the body text with pull quotes placed in the margins. While this is useful to give the reader an overview of the content, the quotes are visually distant from their sources in the body text, appearing beside an above paragraph or, in one case, on the next page (see Zabek & Larrimore, 2020, p. 8). This disconnect could confuse the reader, as it is unclear whether the quote is intended to summarize the current section or introduce the next. Overall, despite a few formatting issues, both texts are visually clear – a crucial foundation for transmitting the written information, as "the wrong design choices can make even a well-written document fail to communicate" (Office of Investor Education and Assistance, 1998, p. 37).

Since the text samples present statistical data, they both make frequent use of graphics. The English sample contains three figures – all bar charts comparing the progression of variables over time. Similarly, the French sample uses line and bar charts to track changes over time, but with a much higher total at 19 charts. It also features 8 word cloud graphics, representing the frequency with which keywords related to the pandemic appeared in Google searches and social media posts. With 27 graphics total, distributed over 11 pages, placement becomes a central factor. On this point, *A Plain English Handbook* emphasizes clearly connecting the text and the graphics, so as not to "break your reader's concentration by separating the two, forcing your reader on a detour to another page in search of the graphic that goes with the text" (Office of Investor Education and Assistance, 1998, p. 53).

Both text samples relate the graphics to specific points of discussion in the body text. The English sample places them in the subject position, such as "Figure 1 shows" (Zabek & Larrimore, 2020, p. 4), aside from one parenthetical reference (see p. 7). With one exception, the graphics feature on the same page as the reference, making the connection clear. The French sample uses parenthetical references introduced by the abbreviation "cf." throughout, and the graphics are grouped under numbered headings, such as "G1 – Indicateurs des recherches et mentions du mot-clé « coronavirus » sur Google et Twitter" (Coffinet et al., 2020, p. 2). Each graph within a group is titled and assigned an alphabetical label. This gives more precision to the in-text references, such as "cf. graphique 4a" (Coffinet et al., 2020, p. 5). However, most of the in-text references relate to the entire group, leaving it to the reader to connect each graphic to the text. Two groups cover an entire page each, which disconnects the graphics from the text, especially when viewing the document in digital format. *A Plain English Handbook* argues that graphics should "stimulate a deeper or quicker understanding and appreciation of a situation than words alone" (Office of Investor Education and Assistance, 1998, p. 53). In this case, the document could be made more streamlined by taking a minimalist approach, including only the graphics that are strictly necessary for the reader to grasp the information.

DISCUSSION

Observations of plain language use

Based on the text samples under analysis, the Fed and the Banque de France both use plain language to a certain extent. The authors appear to recognize the gaps between their own field-specific knowledge and their target audience's knowledge, and adapt accordingly. This is particularly clear from their signposting and definitions of jargon, which might have been left undefined had the texts been aimed at a specialist audience. Additionally, the texts use easily processed syntactic structures, such as active sentences and positive constructions, albeit with a few exceptions. Their paragraph structures are also planned with intention, guiding the reader to the main point before providing secondary information and explanations. Both texts are coherent and cohesive as discourse, although the English sample leaves the interconnections more implicit than the French sample does. Lastly, the information design of both documents is accessible and effective, despite minor layout issues. Taken together, these lexical, structural and visual choices indicate that the texts were written with clarity and readability in mind. There are clear efforts to reach a non-specialist audience, which aligns with the shared objective of both publications to represent and reach consumers.

However, neither text sample adheres perfectly to the applicable plain writing guidelines. While the guidelines are intended as advice rather than absolute rules (European Commission, 2015; Office of Investor Education and Assistance, 1998), and there are in fact cases where the non-plain alternative is warranted, certain structures could be improved upon by applying the guidelines, as shown in the textual analysis. Interestingly, the problematic structures in one text sample are not a one-to-one match to those in the other. If the texts had run into the same pitfalls, this could indicate a cross-linguistic effect, such as a given non-plain construction being prevalent in the field regardless of language. Instead, the variations between the texts in terms of which guidelines they do and do not adhere to point to systematic differences between the overall stylistics of the two languages.

The main differences between the texts in this regard relate to concision and the use of nominalizations. On these points, the French sample adheres to the plain writing guidelines to a lesser extent compared to the English sample. Concision is a central point in both *Rédiger clairement* and *A Plain English Handbook* (European Commission, 2015; Office of Investor Education and Assistance, 1998), and one that has generally been emphasized by the plain language movement, from Strunk and White's *The Elements of Style* to government policy (Schriver, 2017). As indicated by the quantitative analysis – and confirmed by the textual analysis – the French text is less concise overall. Several linguistic structures play into this, including the number of clauses per sentence, punctuation use and wordy phrases that could be replaced by shorter synonyms. The French sample also uses nominalized forms more frequently than the English sample. Nominalizations tend to be longer than their verbal equivalents because they are formed through affixation, and require collocated words, such as verbs and prepositions, to function syntactically. Aside from adding length, nominalizations are more abstract than verbs, which risks convoluting the events and concepts being described (Office of Investor Education and Assistance, 1998). The English sample occasionally uses nominalizations as well, but this is significantly more prevalent in the French sample. The most notable issues in the English sample relate to elegant variation, parallel structures and subject-verb-object proximity. However, this is limited to a few cases and not a general characteristic of the text, while the lack of concision in the French sample is a large-scale issue. In other words, both text samples have problematic sections from a plain language perspective, but there is a clear divide in terms of the extent and the linguistic level of these issues.

This raises the question of why the French sample diverges from the guidelines on concision and nominalizations in particular, while the English sample appears to adhere more closely to plain writing standards overall. One possible explanation is that the historical roots of plain language run much deeper in the Anglosphere than in France, to the point of being codified in U.S. legislation (Schriver, 2017). To reiterate Bennett's (2019) argument, a cultural and philosophical backdrop spanning centuries has cemented plain language as the norm in English, whereas Latinate language cultures have different standards of what constitutes good writing. This could predispose Anglophone writers to prefer concision where French writers are more inclined to nominalize verbs and combine several independent clauses within a sentence. Vinay and Darbelnet (1995) express a similar point from a translation perspective:

> Even though most translations are made between languages which share a general culture, … each cultural group is still sufficiently individual to have distinctive stylistic features of its own. … We can even state as a principle that, where a sentence can be translated literally, we are in the presence of a cultural commonality and, at a higher level, a cultural and philosophical commonality (p. 183).

If plain language use is primarily a question of cultural, philosophical and stylistic trends, this implies that French could have developed a similar norm, had the movement reached the standing that it has in the Anglosphere.

The points where the French sample deviates from plain writing standards also reflect language-wide differences between French and English. For instance, English is more economical in its expression, giving English phrasing an inherent level of concision, which is not equally as natural-sounding in French (Vinay & Darbelnet, 1995). Abstraction, which is identified as problematic by both *A Plain English Handbook* and *Rédiger clairement*, is also more prevalent in French. According to Vinay and Darbelnet (1995), "it can [generally] be said that French words function at a higher degree of abstraction than the corresponding English words. They tend to be less cluttered with details of reality" (p. 52). In turn, Francophone readers likely expect and accept abstractions more readily than Anglophone readers would. These linguistic differences also come into play when translating between languages that do not share the same perception of plainness.

Implications for translators

If the text samples were to be translated into the other language, both French-to-English and English-to-French translators would face the choice between domestication and foreignization. In this case, translation problems would mainly arise from the language-wide differences in concision, nominalization and abstraction. For both target languages, a domesticating translation would involve modulation – altering word and sentence structures from the source text in line with the natural forms of expression in the target language (Vinay & Darbelnet, 1995). A French-to-English translator might express the source text meaning more concisely by splitting the independent clauses in a long sentence into separate sentences. In the same vein, nominalizations could be rendered as verbs and agency given to the subject. Omitting or shortening frequently used phrases, such as "dans le cadre de," would also contribute to concision and clarity, particularly if the phrase is considered semantically empty in English. For an English-to-French translator, a domesticating translation would take the opposite direction; they might domesticate concise English structures through dilution and amplification, which are both processes that add length to the target text. Dilution occurs when the target language equivalent of the translation unit is inherently longer, for instance due to grammatical constraints. Amplification involves adding words to fill a perceived lexical or structural gap in the source language (Vinay & Darbelnet, 1995). As an example, an English-to-French translator might render verbs in the source text as nominalizations. Another strategy for domestication is to explicate the implicit links in the English source text, not only by adding connectors as described in the analysis, but also by combining independent clauses that share a logical connection into one sentence. Such additions can ease readability, as “there are many cases where the word for word translation is unclear and where clarity requires amplification” (Vinay & Darbelnet, 1995, p. 194). This is especially true if the additions align with the level of explicitation expected by the audience.

In contrast, a foreignizing translation would not adapt to the linguistic norm in either direction, but instead remain close to the source text. A French-to-English translator could foreignize the target text by retaining the French sentence structures and internal punctuation regardless of length. Adding to this, they could transpose the nominalized forms, even if this results in abstraction. Meanwhile, an English-to-French translator might retain the concise sentence structure and concrete verbs from the source text. A literal translation of these structures – which represent the main points of divergence between the text samples – would likely read as strange or out of the norm to the target audience. Although the idea of foreignization is to convey these cultural and linguistic idiosyncrasies (Venuti, 2018), this is not necessarily conducive to readability and comprehension. In this sense, domestication would be the more suitable strategy for reaching the target audience, in adapting to the structures that are most familiar to them.

If the communicative goal is for the audience to understand and be able to use the information presented in the text, an important consideration is the applicability of plain language guidelines across languages. Taking stylistic principles developed within the Anglophone tradition and prescribing them cross-linguistically builds on the assumption that these principles are universally applicable. In turn, this assumption overlooks the specific histories and traditions of the other language. Seen through the lens of Venuti's (2018) theoretical framework, this is in itself a form of domestication, which upholds the dominant stylistic trend and denies alternative approaches to writing clearly. Beyond these ethical considerations, the prescriptive approach is also unlikely to produce effective target language communication. Plain English guidelines are the result of, and take their legitimacy from, a specific linguistic tradition. In other words, the guidelines would not necessarily be accepted as legitimate in language cultures that do not share in the Anglophone tradition. Rather, competent writers working in those languages – as well as their audiences – have their own perceptions of clear and effective communication, which may not fit within the "cookie-cutter" approach of prescribing plain English standards. As shown in the case study, the French authors diverged from the prescribed guidelines when these clashed with normative language use, indicating that the linguistic norm takes precedence when it comes to writing to be understood by the target audience.

The case study also suggests that this "cookie-cutter" approach is being taken in an effort to promote clarity across languages in at least one international organization, with a potential ripple effect on national bodies, including central banks. The European Commission's *Rédiger clairement* is clearly shaped by Anglophone plain writing norms, rather than being developed independently with observations of French language use as the starting point. Returning to Schriver's (2014) distinction between universal and conditional principles, certain plain English guidelines appear more universally applicable than others. As an example, defining jargon and abbreviations contributes to clarity in both English and French. However, other guidelines – particularly those related to the syntax, semantics and discourse – are conditional and thus not applicable across languages. In the same vein as Adler's (2012) argument that plain language does not equal simple language, plain English does not equal plain French. Perceptions of plainness are shaped by linguistic tradition, and the sentence structures that an Anglophone reader considers overly complex could be perfectly acceptable to a French reader. This underlines the importance of designing language-specific guidelines. As Schriver (2014) writes, "Principles and guidelines based only on English language research should be considered conditional until we establish that they apply to other languages as well" (p. 65). Developing a plain French standard on its own terms would be a more accurate reflection of what plainness constitutes within the language culture. For English-to-French translators, this in turn implies that a domesticating translation would not necessarily be "less plain" than the source text, as it would be adapted to the target audience's expectations.

Limitations and avenues for future research

The text samples at the foundation of the analysis are single cases. As a result, the findings are only applicable to these samples, and are not necessarily representative of the banks' communications across the board. Even though the banks have established communication strategies with a commitment to plain writing, the fact is that various writers produce texts on their behalf, and there may be idiosyncrasies in style from one text to another. A text's adherence to plain writing guidelines could also depend on the content, in the sense that certain topics lend themselves better to being rendered in plain language than others. In this case, the target audience likely has at least a surface-level knowledge of the subject matter and the circumstances around it, while other topics may be inherently less accessible. These variations do not come to light through case studies alone.

A large-scale corpus study would make it possible to explore the research questions more systematically. However, this would entail developing quantitative parameters that more accurately reflect the boundaries between plain and non-plain language. As seen in the methodology and analysis chapters, the currently available quantitative parameters are problematic when used on their own. In addition to the potential errors in sentence and syllable parsing (Zhou et al., 2017), a purely quantitative approach does not take a whole-text perspective. Instead, the definitions of plain and non-plain structures would be absolute and isolated from context. For example, a model identifying passive constructions would not consider whether the passive is warranted, or perhaps even the most easily understood alternative, in context. The same applies to specialized vocabulary, where definitions and explanatory graphics would not be taken into account. Applying plain writing standards indiscriminately would be counterproductive to evaluating the texts' effectiveness as communication, since plainness is not a universal concept. As discussed in the literature review, the exact parameters of plain language depend on the field and the intended audience (Adler, 2012). A textual analysis, on the other hand, can distinguish between linguistic nuances and consider the context, both within the text and its context of publication – but at the cost of limiting the scope to case studies.

Recent developments in quantitative readability measures offer the opportunity to take a whole-text perspective for larger corpora. The Coh-Metrix index, for instance, is based on findings from psycholinguistics and cognitive research on the reading process. It takes into account the text's coherence, as well as the cognitive processes the reader carries out to parse sentences and decode meaning. Coh-Metrix has been found to outperform traditional readability formulas in predicting learning outcomes for L2 English learners (Crossley et al., 2011). A similar tool, the Integrated Lexico-Syntactic Analyzer (ILSA) was recently developed for Québécois French to evaluate educational texts (Loignon, 2021). While such tools might have given an insightful view of the text samples under consideration here, both were developed for a specific language. In other words, using them in a bilingual comparison risks producing results that are not fully comparable, as the frames of reference may differ. A potential future application for current readability research is to develop a multilingual analysis tool with the same focus on cognition, as well as testing the existing tools with a wider variety of genres, including financial texts.

Another avenue for future research comparing the use of plain financial language between the U.S. and France is usability testing. This involves presenting the text to target-audience readers and surveying them about their reading experience and the specific sections or elements they found difficult to understand. For texts that give direct instructions, the reader's ability to carry out the communicative goal is also taken into account (Schriver, 2017). According to Schriver (2017), usability testing is "the gold standard for knowing what is plain" (pp. 345-346). As a reader-focused method, it moves beyond the guidelines to consider the text's functionality as perceived by the readers. It has also been shown to be a more accurate metric than readability formulas (Schriver, 2014). Considering the pitfalls of applying plain writing guidelines across languages, usability testing with French speakers could inform the design of language-specific guidelines. Identifying what the target audience considers a readable text could contribute to developing plain French independently of the existing plain English guidelines.

The issue of prescribing plain English as a universal standard could also be explored further. Since this proved problematic in the case of *Rédiger clairement*, examining the other versions of the European Commission's guidelines could show whether Anglophone standards are prescribed in the same way for languages other than French. If so, conducting a similar case study of published texts could give insight into how the prescribed guidelines are received – and the extent to which they are applied – by writers working in those languages. To broaden the scope, it would also be interesting to include plain writing manuals that were neither developed in a multilingual setting nor translated from English, to investigate whether Anglophone standards are as influential in these cases.

CONCLUSION

Based on the present case study, the Fed and the Banque de France share certain similarities in terms of their plain language use. Both text samples appear to have been written with accessibility and transparency in mind, despite certain sections diverging from the applicable plain writing guidelines. The main differences concern the specific guidelines from which the texts diverge. The French sample shows a clear pattern of diverging form the guidelines on concision, nominalization and abstraction, while the English sample does not consistently diverge from any specific guideline. This observation can be tied to inherent linguistic differences, as well as norms of language use.

Importantly, both sets of guidelines applied in this case study align with Anglophone writing norms. In other words, the French guidelines have not been adapted to the linguistic and cultural particularities of French. For translators working between English and French, this implies choosing either a strategy that adheres to plain writing guidelines or one that reflects the less dominant linguistic norm. The central point is that plain English is not a universal standard, despite its important influence in spreading the movement to other language cultures. To progress in promoting plain, transparent communication across languages and fields, it is essential that future guidelines be adapted to the linguistic structures, norms and target audience expectations of the language culture concerned.

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