POWERSFUL,
EPERSUASIVE WRITING
FOR COMPLIANCE
SUCCESS

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Overview

• Benefits of clear and concise compliance documents
• Tools and tips for integrating clear and concise writing into compliance programs
• Examples of technical writing enhancements to compliance programs

Ironic Rules for Writers

• Punctuation matters (and commas can save lives):
  eats shoots and leaves or
  eats, shoots, and leaves
• The passive voice is to be avoided.
More Ironic Rules
• Don’t be redundant; don’t use more words than necessary.
• It is wrong to ever split an infinitive.
• Be more or less specific.
• Prepositions are not words to end sentences with.

Background
• Over the past ten years, electric reliability compliance has transitioned from voluntary standards to mandatory, audited standards.
• Over the same period, electric operations processes and procedures have transitioned from use by a small group who “know what we mean” to a larger audience that includes outside auditors who “know what the documents say…..not what was meant”.
• Clear, concise writing is more important that ever

How to Transition....
• Collaborative efforts demand the talents of
  • Subject Matter Experts (SMEs)
  • Compliance Professionals
  • Technical Writers
  • Attorneys
• And specialized skills
  • Technical Skills
  • Analytic Skills
  • Writing Skills
Process

• Allow Sufficient Time to
  • Capture the controls and processes in written document(s)
  • Review the written document (for accuracy
    • to current practice and
    • to the regulatory requirements
  • Implement the written document
  • Collect evidence to support the written controls and processes
    set out in the document(s)

Process, Cont’d

• Test the processes and controls (either through internal audits
  or practice audits conducted by third parties)
• Adjust and correct based on audit results
• Commit to a robust, periodic review of documents (at least
  annual; more frequently as circumstances require) AND to
  rigorous collection of supportive evidence

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***the blank page – for some writers, the most frightening
prospect they must overcome...
Why Technical Writers?

• Properly trained and oriented to the tasks, a technical writer brings skills as important as the technical skills of SMEs and the compliance skills of Compliance Professionals

• Specific Technical Writing Skills:
  • Analytical,
  • Organizational,
  • Assimilative,
  • Communicative...

Not Just Any Technical Writer....

• Selection of a technical writer is as important as selection of an SME or Compliance Professional

• Professional Writing Skills are a threshold consideration, AND additional skills are equally important for a successful compliance technical writer:

Key Attributes for Effective Compliance Technical Writers

• Commitment to Organization’s Culture of Compliance

• Sufficient understanding of
  • Technical/operations
  • Compliance standards and requirements

• Expert Verbal Communications and Conflict Management skills, Patience and Persistence

• Writing Samples and Recommendations
More Ironic Rules

• Avoid cliches like the plague.
• Contractions don’t belong in formal writing.
• One should never generalize.
• Adverbs always follow the words they modify.

Compliance Training and Orientation for Technical Writers

• Introductions to SMEs and Compliance Professionals
• Operations Overview;
• Compliance Overview;
• “How to Read a Regulatory Requirement;”
• “How to Present to an Auditor;”
• “How to Prepare for a Reliability Audit;”
• Formats

Technical Writing Process for Compliance Documents

• Informational Interviews with SMEs
  • Who, what, when, where, why and how
  • Process Flow Charts and Checklists
  • Evidence and documentation for Compliance
• Drafts in Format
• Reviews of Drafts with SMEs and Compliance Professionals
• Field Testing of Draft
• Transition from Draft to Final Document(s)
Why Well Written Document(s) Matter

- Practical Considerations:
  - Daily Roadmaps for activities of SMEs and Compliance Professionals
  - Beyond the “we know what we mean” mentality to the “we do what we wrote” mentality
  - Enhancements to rigor, replication and resilience for the operations and for compliance
  - Strategy for Reduction of Errors, including Human Error, reducing the need for “heroic efforts”

Why, Continued

- Compliance Considerations:
  - Clear, understandable documents enhance credibility of the compliance program
  - Clear, understandable documents improve auditors’ perceptions of the compliance program:
    - Reduce need for “clarification questions”
    - Streamline SMEs audit presentations
    - Organize evidence and documentation
    - Improve auditor confidence in compliance program

Tools and Tips for Technical Writers and Compliance Professionals

- Think it through before writing it out
- Adopt a bias towards clear and understandable over concise – don’t skip any steps
- Consider process mapping and other analytical and organizational tools
- Organize and write for practical “day to day” use by SMEs first and for compliance secondly
- Review structure and drafts with a knowledgeable SME outside the “day to day” applications
- Review with compliance professionals
- Review with counsel
Tools and Tips, continued

• Use "fresh eyes" for review
  • Assemble a small review group, including people with technical, compliance and regulatory/legal expertise but no "day to day" application responsibilities
  • Review for "words on the page" and not for "what we do" or "what we meant"
  • Search for gaps, inconsistencies, imprecise wording, and other hindrances to clarity

Tools and Tips, continued

• Smarter than a Fifth Grader?
  • Write to the level of an intelligent and engaged upper gradeschooler
  • Understand that those using the documents daily have many competing demands and responsibilities and no time to “figure it out” or ponder what the document “means” – meanings must be immediately apparent.
  • Likewise, how a document fits into practices and processes must also be apparent.

Tools and Tips, continued

• scrub documents for words and phrasings that can become compliance landmines:
  • All, Always, Every, Each – words that can inadvertently foster non-compliance.
  • Actions without a clearly designated "actor"
  • Actions without a clearly designated time to be completed
  • Words that create an "above and beyond" compliance expectations
Tools and Tips, continued

- Set reasonable, achievable schedules for technical writers, SMEs and compliance professionals, with daily checks on progress during the drafting process.
- Be prepared to address any barriers that writers, SMEs and compliance professionals encounter during the drafting process.
- Run reviews parallel to drafting processes.

Tools and Tips, continued

- Integrate training into the “roll out” for new documents and processes.
- Review documents, processes and evidence periodically, especially during the first few months, to catch and correct any issues that arise during implementation.
- Encourage all, technical writers, SMEs and compliance professionals, to stay engaged and to think proactively, from drafting to roll out.

A Gas Compliance Example

- Step 1 – Formulated work plan to draft written processes and control documents.
  - Process mapping
  - SME interviews
  - Technical writer training and SME training
- Step 2 – Studied work plan to gauge practicality of plan and schedule.
- Step 3 – Implemented work plan with daily team meetings and work reviews.
Example, continued

- Step 4 – Integrate Compliance training into the drafting and review processes
- Step 5 – Review drafts rigorously
- Step 6 – Continue to monitor during roll-out and implementation – and be prepared to make adjustments as necessary
- Step 7 – Review documentation collected for compliance with regulations and for congruence with drafts

An Electric Compliance Example

(Original NERC CIP Implementation)

- Plan established for Drafting Project
- Steps Similar to those for Gas Example
- Daily status checks and updates during project
- Annual reviews built into the Standards
- Training (for SMEs and Compliance Professionals) on drafts prior to roll out is vital to success

Takeaways

- No technical writer writes in a vacuum
- SMEs have technical skills; rarely, they have technical writing skills, too.
- Compliance professionals have analytical skills; rarely, they have technical writing skills, too.
- Collaborative approach works effectively – writers, SMEs, and Compliance professionals
Takeaways, continued

• Communication among the groups
• Conflict Management as needed
• Training – initial training and on-going training
• Reviews and tweaks keep the documents relevant and accurate
• Commitment to compliance and to continuous improvement

Thank you for your attention and your participation!

Have a Super Conference.