Communicate for Action

General Method for Communicating in a Policy Process

KEY CONCEPTS: Communicate in Context // Plan Before You Produce

Step 1: Prepare

First, ask questions about the policy process.

Policy

- To what policy action (underway or anticipated) does this communication relate?
- Does a policy already exist?

Problem

- What conditions are problematic?
- What problem do these conditions present?
- How do I define the problem?
- How do others define the problem?

Actors

- Who are the actors?
- What are their roles?
- What are their interests?
- Who else has a significant role or interest in the process?

Politics

- What are the major disagreements or conflicts?
- What are the major agreements or common interests?
- Which actors are most likely to influence the process or the outcome?

Step 2: Plan

Second, ask questions about the communication.

Purpose

- Why is this communication needed?
- What do I want to accomplish?

Message

- What is my message?
- How does my message differ from others on the topic?
- What argument will I make to support my message?
- How does my argument relate to others on the topic?

Role

- What is my role in this process?
- What is my interest in the outcome?

Authority

- Whose name will be on the document(s): Mine? Another's? An organization's?
- For whom does the communication speak?

Reception

- Who is (are) the named recipient(s)?
- Who will use the information?
- Will the document(s) be forwarded? Circulated? To whom? Represented? By whom?

Response

- What will recipients know after reading the document(s)? What will users of its information do?
- What is likely to happen as a consequence of this communication?

Setting and Situation

- What is the occasion? What is the time frame for communicating?
- Where, when, and how will this communication be presented?
- Where, when, and how will it be received? Used?

Form and Medium

- Is there a prescribed form, or do I choose?
- What is the appropriate medium for presentation and delivery? A written document? A telephone call? Email?

Contents

- What information will support the message?
- Where will a succinct statement of the message be placed?
- How should the contents be arranged to support the message?
- How will the document's design make information easy to find?

Tone and Appearance

- How do I want this communication to sound? What attitude do I want to convey?
- How do I want the document(s) to look? Is a style or layout prescribed, or do I choose how to present the contents?
- Document Management
- Who will draft the document? Will there be collaborators?
- Who will review the draft? Who will revise it?

Step 3: Produce

Based on your preparation and planning, write the document. Do it in three separate passes: draft first, review second, and revise third. Do not mix the tasks. Separating those tasks allows you to manage your time and handle distractions while you write, and to communicate better in the end.

The tasks are outlined here. Use this outline to stay on track if you're working alone, or under pressure, or producing a short document. If you're collaborating or team-writing, or if you're creating a multidocument product, adapt the task outline to your circumstances.

Draft

- Produce a complete working draft in accordance with your preparation and plan (your answers to the questions above).

Review

- Compare the draft to the plan and highlight any differences.
- Get additional review of the draft by others, if advisable.
- Refer to the checklists (shown below) to assess the draft's effectiveness and quality and to highlight needs for revision.

Revise

- Make the changes called for by review.

Two Checklists

Features of Effectiveness. A public-policy communication is most likely to be useful if it addresses a specific audience about a specific problem, has a purpose related to a specific policy action, represents authority accurately, uses the appropriate form, and is designed for use.

- ❑ **Addresses a specific audience about a specific problem:** In policy work, time is scarce. Specifying a communication's audience or intended recipient(s) and the subject or problem(s) saves thinking time for writer and reader (or speaker and listener). The information's relevance for the recipient should be made clear.
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- ❑ **Has a purpose related to a specific policy action**: Policy cycles have several phases. Multiple actions and cycles are underway simultaneously. Timing matters. Agendas change. Stuff happens. Therefore, explicitly stating a communication's purpose and relevance to the recipient makes it more likely to get timely attention.
- ❑ **Represents authority accurately:** Policy communications do more than present information; they also represent a type of participation and power. For a policy communication to be taken seriously, to have influence, and to influence rightly, the communicator's role and status—a citizen with an opinion, an expert with an opinion, a spokesperson for a nongovernmental organization, a government official—must be accurately represented.
- ❑ **Uses appropriate form:** Settings of policy work have their own conventions for communicating. Use the document type, style, and tone of presentation that are expected for the purpose and that accommodate working conditions in the setting of its reception.
- ❑ Is designed for use: People's attention is easily distracted in settings of policy work. Dense, disorganized text will not be read or heard. For people to comprehend under conditions of time pressure and information overload, contents must be easy to find and to use. Written documents should chunk information, use subheadings, and organize details in bulleted lists or paragraphs or graphics. Spoken texts should cue listeners' attention with similar devices.

Measures of Excellence. No two communications are exactly alike, but every public policy communication should try to meet criteria for clarity, correctness, conciseness, and credibility.

- ❑ **Clarity:** the communication has a single message that intended recipients can find quickly, understand easily, recognize as relevant, and use.
- ❑ **Correctness:** the communication's information is accurate.
- ❑ **Conciseness:** the communication presents only necessary information in the fewest words possible, with aids for comprehension.
- ❑ **Credibility:** a communication's information can be trusted, traced, and used with confidence.

Communicate for Action
Present Testimony & Answer Questions

KEY CONCEPTS: Prepare to Write AND Speak // Summarize // Be Responsive

Step 1: Prepare

Know the context. To what policy process does the hearing relate? Who's holding the hearing? What is the stated purpose of the hearing? What is the political purpose? Who else is on the witness list? What are their messages likely to be?

Know your message. Distill your message into one to two sentences that you can remember and can say easily. How does your message relate to the purpose of the hearing? How does it relate to other witnesses' messages? Anticipate committee members' responses and questions. What are you likely to be asked?

Know your role. Are you speaking for an organization? For yourself? Why are you testifying? What do the organizers of the hearing hope your testimony will accomplish?

Know the communication situation. Will the press attend the hearing? Are you available for interviews after the hearing? Will the hearing be televised? How is the hearing room arranged? Do the arrangements allow you to use the charts, posters, or slides? Are those visual aids a good idea if the room lights cannot be dimmed (due to televising of the hearing)? What is the location for the hearing? If you are using charts, posters, or slides, how will you transport them? Who will set them up in the hearing room?

Rehearse your delivery. Will you read your statement or say it? Generally, saying it is preferred. Be ready to do either, however. Rehearse by reading the full statement aloud and by speaking from an outline. You'll discover which way is easier for you and which you need to practice more.

Step 2: Write the Statement

- Title page or header to identify the organization and the witness, the agency holding the hearing, the topic, the date, and the location of the hearing
- Greeting to thank the organizers for the opportunity to testify and to state why the topic is important to the witness
- Message to state the main information the testimony provides
- Support (evidence, grounds) for the message
- Relevance of the message to the hearing's purpose
- Optional: discussion or background to add perspective on the message (only if relevant or if specifically requested by conveners of the hearing)
- Closing to conclude the testimony and invite questions

Step 3: Present the Testimony (oral summary)

- During oral delivery, whether reading a document aloud or speaking from an outline, state only the essentials. Save the details for the question-and-answer period.
- State the message up front.
- Stay within time limits. Usually, the chair of a hearing will tell you the time limits. If not, assume that you have 2–5 minutes for a summary. Do not go over the limit.
- Listen. Closely attend to the opening statements by the committee chair, the committee members, and the other witnesses. Opening statements cue the questions that you might be asked. Or they might include content to which you want to respond later, when it is your turn to speak. Committee members might ask you to comment on other witnesses' testimonies.

Step 4: Answer Questions

- Answer credibly. Effective answers are honest, accurately informed, and relevant.
- Listen to the questions asked of other witnesses. Do not daydream or lose focus while others are being questioned.
- When the questions are put to you, make sure you hear each question correctly. If you are not sure you heard the question correctly, ask to have it repeated.
- Be responsive. Answer the question that is asked, not some other question that you half-heard or that you prefer.
- Use your answer to emphasize your message, if you can do so with relevance to the question asked.
- Stop when you have answered a question. Postpone details, elaboration, or qualification on your original answer until you get a follow-up question.
- Do not lie or invent information. If you hear yourself fabricating an answer (perhaps out of nervousness), stop. Politely ask to have your answer removed from the record, and begin again.

Handle these situations especially carefully:

- **You are asked for your personal opinion.** When you testify as spokesperson for an organization, be careful to present the organization's viewpoint. Avoid giving a personal opinion unless specifically requested, and then only if you appropriately can do so. If you do, be careful to distinguish your own view from the organization's.
- **You don't know the answer.** Depending on the dynamics at the moment (neutral or friendly or confrontational) and considering the effect on your credibility of not answering, you might choose among these options: Simply say you do not know; say you are not prepared to answer but can provide the answer later; ask if you might restate the question in a different way that you can better answer, or defer to another witness who can better answer the question.
- **Your credentials are challenged, or your credibility is attacked.** Do not get angry. Do not confront. Politely state your or your organization's qualifications to speak on the topic of the hearing. Restate why you are testifying or why the hearing topic is important to you or your organization. Maintain your role in the hearing as a source of information and perspective not offered by others. Maintain your composure.

Communicate for Action
Make Public Comment in Rule Making

KEY CONCEPT: Public Input on Rule Making

Public comment is important because public policy broadly affects present and future life. A call for public comment invites any member of the public – individuals, communities, organizations – to influence the standards and regulations that affect real lives, livelihoods, and environments. Public comment is easy to make. Anybody can write a useful comment. The more who do so, the better the likelihood of good government.

While expert commentary is always appropriate, you need not be an expert to comment. Administrators want and need to hear from anyone who can make a useful comment. There is no template for public comments, unlike legal briefs. A simple letter can have an impact. If friends or a community organization shares your views, you might want to present a collective comment. You might sign for the group, or all individuals involved might sign, or the organization's officers might sign.

Task #1. Find Calls for Public Comment

The U.S. government's official source for notifications of proposed rule making is the Federal Register, published daily. You can find the Federal Register either in government information depository libraries or online **http://www.gpo.gov/fdsysinfo/aboutfdsys.htm**.

You will find calls for comment in the section titled "Proposed Rules" or the section titled "Notices." Look for announcements by agencies authorized to act on topics of concern to you.

Alternatively, if you already know the executive branch department, and within it the relevant agency that administers your area of concern, do not go initially to the Register. It can be overwhelming, and you might have to look at the index every day to follow the government's activities on an issue of concern. Instead, first try the web site of the relevant department (Department of Health and Human Services, for instance); search there for the relevant agency (Food and Drug Administration, for instance). If you do not know what department or agency to search for, go to the web site of an advocacy group associated with your concern. Browsing there is likely to turn up the name of both the department and agency. Then proceed with searching the agency's web site for notifications.

Easiest of all, go to Regulations.gov, the federal portal for submitting public comments online. It is streamlined and easy to use. At **http://regulations.gov** search for the docket or topic on which you want to comment (Food Safety Modernization, for example), read the pertinent instructions, and submit your comments.

If you are concerned about a state issue, you can find calls for public comment in state notifications, such as the Pennsylvania Bulletin or the New York State Register. Every state has one. Familiarize yourself with the index and other finding aids for the state publication you are likely to use often.

Alternatively, if you know the jurisdiction for your concern, go first to the web site of the state agency with jurisdiction. Or go to the web sites of interested associations and advocacy groups to find where you can make a comment on an active issue. Often, you will find sample comments there, too.

If you want to comment on a local government matter, consult local newspapers. Local government calls for public comment are published in the public notices section of newspapers. Notifications are also posted in local government offices or, possibly, on their web sites.

Task #2. Write the Public Comment Document

In most respects, writing a public comment is like writing any other policy document. The demands for preparation and planning are the same. The same criteria for clarity, credibility, and conciseness apply. One possible difference: some calls for public input specify the exact information needed. If the call to which you are responding does specify the contents, be sure to provide them as requested. If you have additional information, include it too, but not at the expense of requested contents.

To help ensure that your comment will be taken seriously, include the following features and qualities:

- Narrow focus
- Evidence, analyses, and references supporting your view
- Indication of public support of your view
- Positive and feasible alternatives

Before you write, use the General Method to plan. After you write, check the product against the expected standards (Checklists).

Public Comment Worksheet

Submission Information

Document Type: ______________________________

This is a Comment on Prosposed Rule: ______________________________

Docket ID: ______________________________

Your Name: ______________________________

Address: ______________________________

Phone: ____________________ **E-Mail:** ____________________

Comment

• 1–2 sentence message

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Reasons & Support

• Reasons tightly fitted to my message
• Experience, analysis supporting my reasons and based on my authority

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Action Request

What I want administration to do. Specify Changes.
• Keep the approach but change this rule... • Reject the approach because... • Re-write this rule to...

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Communicate for Action
Example Sheet

A Message to Public Officials on Food Safety

By Brian Snyder, Executive Director Pennsylvania Association for Sustainable Agriculture (PASA) May 22, 2009

It seems everyone in elected office these days wants to do something about food safety…As a community of farmers, we must also come to terms with the fact that harmful pathogens occasionally present in food can originate on farms in various ways that at times defy easy explanation.

Now let us consider the desire folks in government have to devise a legislative solution for the problems of food safety…It is the acknowledged job of government to protect us to the extent possible from negligence and preventable forms of injury and/or death. But it is distinctly NOT the job of government to attempt to eliminate risk in life altogether, nor to impose expectations that may impinge unnecessarily on the free enterprise activities of the citizenry without a clearly understood benefit.

More than anything else right now, we need some plain talk on the real issues involving the safety of our food supply. With good science available on all sides, there is widespread disagreement about what matters most and why any of us should care.

We at PASA believe quite simply that the most important thing anyone can do to reduce risk in the food system is to make it as locally-based as possible. A safe food system is built on trust, and trust is built on actual human relationships. Such relationships are harder to maintain the larger and more diffuse the food system becomes.

Furthermore, we contend that the greatest risks to food safety occur when two systemic factors are combined: a) "food anonymity" and b) geographically broad distribution patterns. The most basic strategies for achieving a safe food supply, therefore, are not only to keep the distribution patterns as local and/or regional as possible, but also to put the farmers' faces back on the food. In an ideal scenario, both strategies would occur. Whatever else is said about specific practices on a farm or in a food processing facility, these two factors should be acknowledged as priorities and properly rewarded by the regulatory authorities right up front.

With this in mind, the following three-tiered structure seems both to be the current reality in food production and marketing systems, and a necessary framework for any successful effort to further regulate food safety and security:

1. **Farm-direct** – This includes farm stands, farmers' markets, community supported agriculture (CSA) programs (e.g. subscription farms) and other innovative strategies where the relationship between individual farmers and consumers is immediate and understood.
2. **Identity-preserved** – This involves distribution patterns on a regional scale where the farmer and consumer do not necessarily meet, but the identity of the farm is preserved on products all the way through the system, from field to fork.
3. **Commodity stream** – This represents sales where no direct relationship between farms and consumers exists. The farm identity is vague or lost altogether, sources are aggregated and distribution tends to be widespread, including food exported to other countries.

The essential element here is not that there is some theoretical distinction between "good" and "bad" farmers…This is also not fundamentally an issue of "big farms" vs. "small farms," though it appears unavoidable that vocal contingents on both sides of that divide will try to make it so.

The most pressing concern right now is that, in the rush to do something productive on the most public aspects of safety and security in the food supply, our public officials might take action that will a) do too little, for fear of offending some of the powerful interests involved, or b) do too much and thereby inflict real damage onto one of the most promising trends in agriculture to come along in at least half a century.

But if we can really get this right, a visionary and "fresh" approach concerning food safety at local, state and federal levels of government might lead to an agricultural renaissance in this country that will do as much for the economic health of our rural communities as it will for the physical health of our people.

(The complete statement can be found at: **http://pasafarming.org/news/policy-statements**)

Communicate for Action
Example Sheet

Food Safety on the Farm: Policy Brief

October 2009

For over twenty years, the National Sustainable Agriculture Coalition (NSAC) has advocated for federal agricultural policies that foster the long-term economic, social, and environmental sustainability of agriculture, natural resources, and rural and urban food systems and communities. NSAC's vision of agriculture is one where a safe, nutritious, and affordable food supply is produced by a legion of family farmers who make a decent living pursuing their trade, while protecting the environment, and contributing to the strength and stability of their communities. NSAC's work has resulted in federal programs that promote small and mid-sized family farms, increase new farming and ranching opportunities, invest in sustainable and organic research, reward conservation excellence, and expand local and regional food systems.

Over the last several years, the rise in major outbreaks of foodborne illnesses has called into question the sufficiency of the U.S. food safety system. Up until now, food safety regulatory oversight has focused mainly on processing, food handling, and manufacturing sectors – areas shown to be of highest risk for foodborne pathogen contamination. However, several food safety bills have been introduced into the 111th Congress that could directly or indirectly affect farms and ranches by expanding these authorities and making some on-farm safety standards mandatory. In addition, in the spring of 2009, the Obama Administration created an inter-agency Food Safety Working Group through which the Food and Drug Administration and U.S. Department of Agriculture are adopting new food safety standards and oversight, including on-farm measures.

While NSAC applauds Congress and the Administration for taking steps to decrease foodborne illnesses by strengthening federal food safety oversight and enforcement, in respect to farms it urges decision-makers to ensure that:

- Measures are risk-based, focus on risk reduction, and are justified by scientific research;
- FDA coordinates with other state and federal agencies and community-based organizations with food safety expertise or pre-existing standards or training programs for standard development and enforcement;
- Standards do not discriminate against, but rather encourage, diversified farming operations and conservation practices;
- Standards are appropriate to the scale of the enterprise;
- Fees of any kind, if they are imposed, are equitable to reflect different scales of production and ability to pay;
- Traceability rules for farmers should not require more than good, basic recordkeeping (one-up, one-down) of all sales;
- Marketing Agreements and Orders are not used to regulate food safety.

NSAC members and food safety experts agree that the responsibility for ensuring that our food is safe is incumbent on all actors in the food supply chain: from farmers, packers, processors, and distributors, to the final consumer. It is our position, however, that proposals proffering one-size- fits-all solutions to food safety fail to acknowledge the diversity of agriculture and are inappropriate and counterproductive courses of action.

(The complete brief can be found at **http://sustainableagriculture.net/wp-content/uploads/2008/08/NSAC-Food-Safety-Policy-Brief-October-2009.pdf**)