

EASY – PLAIN – ACCESSIBLE

Christiane Maaß

**Easy Language –
Plain Language –
Easy Language Plus**

Balancing Comprehensibility and Acceptability

Christiane Maaß

Easy Language – Plain Language – Easy Language Plus

Silvia Hansen-Schirra / Christiane Maaß (eds.)
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To my father, Walter Helbig

Table of Contents

0 Introduction and motivation: Easy – Plain – Accessible.....	11
1 Accessible communication.....	19
1.1 General outlines	19
1.2 Barriers in communication	22
1.3 Features of accessible communication: an overview	26
1.4 A closer look at the individual pairs of features	29
1.4.1 Facilitate retrieval through retrievability	29
1.4.2 Facilitate perception through perceptibility	36
1.4.3 Facilitate comprehensibility and recall through comprehensibility and linkability	41
1.4.4 Facilitate acceptance through acceptability	44
1.4.5 Facilitating action through action-enabling potential	47
2 Easy and Plain Language in Germany	49
2.1 Easy and Plain Language as part of communicative accessibility	49
2.2 Questions of terminology: “Easy Language” / “Plain Language”	50
2.2.1 “Easy”, “Plain”, “Simple”: The problem of connotations	50
2.2.2 Easy-to-Read or Easy Language?	52
2.2.3 Beyond “Easy-to-Read”: Non-reading information input	54
2.3 The legal situation of Easy and Plain Language in Germany	56
2.3.1 Impulses from the UN Convention on the Rights of People with Disabilities (UN CRPD)	56
2.3.2 The situation of accessible communication / Easy and Plain Language in German legislation.....	58
2.4 A lot of good will and unexpected pitfalls	64

3 Easy Language	69
3.1 Easy Language: The practical guidelines	69
3.1.1 The German version of the Inclusion Europe guidelines	69
3.1.2 The guidelines of Netzwerk Leichte Sprache (“Network Easy Language”; 2009)	71
3.1.3 Appendix 2 of the Accessible Information Technology Regulation (“Barrierefreie-Informationstechnik-Verordnung”, BITV 2.0)....	73
3.1.4 Overlaps and differences between the practical guidelines.....	74
3.2 Easy Language: The scientifically founded rulebooks	78
3.2.1 Why scientifically founded Easy Language rulebooks?	78
3.2.2 The first scientific rule book (“Leichte Sprache. Das Regelbuch”, Maaß 2015)	82
3.2.3 The Duden Leichte Sprache (“Duden Easy Language”).....	83
3.3 The features of Easy Language.....	88
3.3.1 General remarks	88
3.3.2 Characteristics of Easy Language.....	91
3.3.3 Word level.....	95
3.3.4 Syntactic level	108
3.3.5 Text level	118
3.4 The symbolic function of Easy Language.....	132
3.5 Quality assessment for Easy Language	135
3.5.1 Text assessment.....	136
3.5.2 Assessment of the production process.....	137
4 Plain Language and its equivalents	139
4.1 Is Plain Language the solution?	139
4.2 Plain Language approaches on an international scale	140
4.3 A typical example: A Plain English Handbook (1998).....	144
4.4 Citizen-oriented Language (“Bürgernahe Sprache”) in Germany.....	146
4.5 Plain Language approaches in Germany.....	150

4.6	Strategically dosing comprehensibility: Plain Language as a “chest of drawers”	155
4.7	A short summary on comprehensibility enhanced varieties in the German context	165
5	Easy and Plain Language: Text creators, text users and bystanders	169
5.1	The different participant roles in accessible communication.....	169
5.2	Easy and Plain Language translators and interpreters and other types of text experts	171
5.2.1	Skills and qualifications of Easy and Plain Language text experts.....	171
5.2.2	Easy and Plain Language translation and interpreting.....	173
5.2.3	Professional profiles and requirements.....	176
5.3	Plain Language text authors	179
5.4	Accessibility activists	181
5.5	Text assessors.....	183
5.6	The primary target groups.....	185
5.6.1	Easy and Plain Language for people with and without disabilities.....	185
5.6.2	A short outline of the main target groups	187
5.6.3	Old age as an underestimated factor in accessible communication.....	191
5.7	Domain experts.....	194
5.7.1	Domain experts as users of accessible communication.....	194
5.7.2	Implementing accessible communication in organisations.....	197
5.8	The secondary target groups as text users and bystanders	200
5.8.1	Different attitudes and forms of handling Easy Language text offers by the secondary target groups.....	200
5.8.2	The secondary target groups as text users	202
5.8.3	The secondary target groups as indirectly addressed bystanders.....	203

6 Stigmatisation of the primary target groups through Easy Language	205
6.1 Disability as stigma.....	205
6.2 Easy Language: considering the dimensions of stigma	209
6.3 Features of Easy Language texts that potentially enhance stigma	217
6.4 The “ban on staring” and its impact on text quality in Easy Language translation	222
6.5 Conclusions for Easy Language text practice	224
7 Modelling “Easy Language Plus”	227
7.1 Easy Language – Plain Language – Easy Language Plus	229
7.2 Evaluating the impact of the individual Easy Language features.....	233
7.3 An example for Easy Language Plus	262
8 Conclusion and outlook.....	277
Bibliography	283

0 Introduction and motivation: Easy – Plain – Accessible

The best offer isn't worth anything if it is not acceptable and therefore not used. Easy Language has come a long way over the last years: it has become part of legislative efforts, many texts have been produced, new medial realisations have been developed. Right from the start, the main goal of Easy Language has been to enhance the comprehensibility and perceptibility of communication offers. But it has become more and more obvious that this is not sufficient. If the focus is entirely on those two mentioned qualities, this may lead to new problems as such offers might not be acceptable. In fact, acceptability may be reduced for the users, or some user groups, of Easy Language themselves or for the majority society.

One might be tempted to assume that this does not matter, as people with communication impairments have a right to inclusion and that everyone else will have to deal with the situation. But it is not that simple. If communication offers that are broadly visible in public are not quite acceptable, they have the potential to stigmatise the primary target groups. This is harmful to the project of inclusion.

In addition text offers in the field of accessible communication have the potential to be used beyond the primary target groups. This is a potential boost to inclusion: As they are entitled to accessible communication products, the users with communication impairments make meaningful contributions to the benefit of society as a whole. In asserting their rights, they elicit more comprehensible texts that can then be used by everyone. But this will only work if these text offers are acceptable.

Accessible communication offers are also often unacceptable for only certain parts of the primary target groups. This is often the case for older people. They constitute a very large group of potential accessible communication users and, yet, have been largely neglected as target groups of accessible communication. Many older people have visual and/or hearing impairments or neurological diseases like dementia-type illnesses. In Germany, almost 6 out of 83 million inhabitants are 80 years or older; 23 million are older than 60 years. Around 45% of the people beyond 80 suffer from different kinds of disabilities and often from multiple forms. Ageing societies are wise to invest in accessible communication.

One of the largest single groups of potential Easy Language users are people with dementia-type illnesses. Many people can sympathise with this target group as almost everyone knows someone who is affected. This fact helps people to understand why accessible communication offers are necessary. But this will only work if these offers are executed in an acceptable way.

Therefore, the present book focuses on the balance between **comprehensibility** and **perceptibility** on the one side, and **acceptability** and **stigmatisation potential** on the other. The book shows how accessible communication, and especially easy-to-understand languages, should be designed in order to become instruments of inclusion. The book examines two well-established easy-to-understand varieties: **Easy Language** and **Plain Language**. It shows that they have complementary profiles with respect to the four qualities mentioned above. The book then proposes another easy-to-understand variety: **Easy Language Plus**. Easy Language Plus is proposed as a variety that balances the four qualities and is modelled in the present book.

Easy Language – Plain Language – Easy Language Plus: Easy and Plain Language are part of accessible communication. Easy Language (in German: “Leichte Sprache”) texts were originally designed for people with cognitive disabilities. Today, Easy Language also enables other groups with and without disabilities to access communication. Among them are, as I already stated, people with dementia-type illnesses, but also people affected by aphasia, pre-lingual hearing loss, as well as functional illiterates and language learners with and without disabilities.

Many communication products are not accessible to quite a number of people: the source texts are often too difficult to perceive, too hard to understand or not available in an accessible media format. Easy Language texts address these issues, even if they do not completely dismantle, but lower communication barriers. Easy Language is the most comprehensible variety of a natural language. One drawback is that Easy Language struggles with acceptability issues: Comprehensibility is enhanced at the detriment of acceptability, even to a degree that (as I will argue) potentially stigmatises its users.

Plain Language (in German: “Einfache Sprache”), on the other hand, does not primarily address people with disabilities. In its original purpose, it was first and foremost a means to open expert contents for lay people, for example, by providing people without legal or medical training access to the respective expert communication. Since the 1960s, however, Plain Language has also been proposed for people with communication impairments. In some Europe-

an countries, it is used instead of Easy Language as an instrument for communicative inclusion. Plain Language is much more acceptable than Easy Language, but at the same time it is also far less comprehensible (and usually also less perceptible). This means that, while Plain Language does not stigmatise users, it might not be easy enough for some user groups to retrieve and process the information within Plain Language texts.

This book deals with Easy and Plain Language as well as with Easy Language Plus, which is, in some respect, a potential way to solve the comprehensibility vs acceptability dilemma. Germany is a late bloomer as far as policy making for people with disabilities is concerned: the first Disability Equality Act on the federal level dates from 2002. But it has made a great deal of progress in a comparatively short time with regard to its Easy Language law-making and also with regard to implementation in text production. In the German political discourse, there is a strong empowerment movement that has set the political agenda for Easy (and not for Plain) Language. Moreover, and still quite untypically for Easy Language on a global scale, there is a very active research landscape for Easy Language in Germany. I will describe the route that Easy Language has taken in Germany and then outline the success of the Easy Language movement and explain the current legal situation. I will give insights into the German Easy Language guidelines and research practice. On a more general scale, I will examine the conditions of communicative accessibility and the potential pitfalls with respect to acceptability.

Plain Language, by contrast, is less developed in Germany: less than Easy Language in Germany, but also less than Plain Language in other countries. I will nevertheless provide a short outline of the legal situation of and research on Plain Language in Germany, as well as a proposal on how Plain Language could be modelled in the continuum between standard language and Easy Language.

	Easy Language	Plain Language
Perceptibility	✓	–
Comprehensibility	✓	–
Acceptability	–	✓
Avoids stigmatisation	–	✓

Table 1: Characteristics of Easy and Plain Language

Table 1 shows a simplified overview of the main contrasting characteristics of the two varieties. While German Easy Language, with its concrete rules, is a clearly delimited entity, Plain Language is conceived as a continuum that bridges the gap between Easy Language on the one side and expert language (or standard language respectively) on the other.

A solution to the dilemma presented in Table 1 could be to balance the four qualities (perceptibility, comprehensibility, acceptability, danger of stigmatisation) that define the profiles in order to ease the stigmatisation potential and enhance acceptability, while also maintaining high levels of perceptibility and comprehensibility: Following the models of comprehensibility enhanced varieties of Dutch or Finnish, I will describe the outlines of Easy Language Plus (EL+), an intermediate version between Easy and Plain Language that dispenses with some of the least acceptable features of Easy Language and, at the same time, maintains comparatively high levels of perceptibility and comprehensibility.

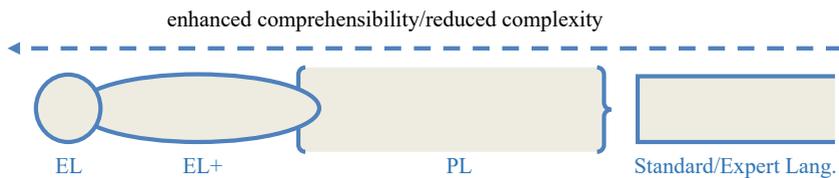


Figure 1: Easy Language – Easy Language Plus – Plain Language – Expert Language

Easy Language Plus has the advantage of not stigmatising the target audience, as it has moderately enhanced perceptibility and foregoes those Easy Language rules that deter the broad public the most and therefore reduce the acceptability of Easy Language. On the other hand, Easy Language Plus is not as close to the standard texts as Plain Language usually is. As opposed to most Plain Language texts, Easy Language Plus texts will have to be produced by specialised experts – just like Easy Language texts.

This model has a downside though, as Easy Language has more than one function: It makes content accessible, thus giving people the chance to participate in all aspects of public life. But there is another function that is rarely ever pointed to: Through their perceptible differentness, Easy Language texts make the target audience, that is often overlooked in their needs, visible in public discourse. Easy Language Plus, which strives to blend in with standard expectations, can serve this symbolic function only to a more limited extent. There

is a dilemma between those two irreconcilable functions of Easy Language, as I will show in this book. Nevertheless, Easy Language Plus, if well-executed, has the potential to promote communicative inclusion and will be discussed in this book.

This book is structured as follows:

Chapter 1 is dedicated to the field of **accessible communication**. All three linguistic varieties discussed in this book (Easy Language, Plain Language, Easy Language Plus) belong to the field of accessible communication. They play a role in the effort to make communication accessible to people for whom standard or expert texts represent barriers they cannot overcome. This chapter describes how texts can constitute barriers for people with different needs and conditions and what has to be done to overcome such barriers. It looks at the conditions that make content accessible and enable the target audience to act on the basis of the information (or other content) given in a text.

Chapter 2 takes a closer look at **Easy and Plain Language in Germany**. It discusses terminology and provides an overview of the different laws and regulations concerning Easy Language in Germany. The German situation illustrates well the development of the legal situation and the translation market. But although Germany has moved quickly with regard to Easy Language and accessible communication during the last years, there are unexpected pitfalls and backlashes: Not always are the comprehensibility-enhanced texts well received by the broad public. On the contrary, they may become subject to stigmatisation processes and trigger blunt rejection on the part of the majority society.

Chapter 3 is centred on **Easy Language** and its rules and principles. It introduces and compares the three most commonly used German practical guidelines: the German version of the Inclusion Europe guidelines on Easy-to-read information; the guidelines of the German Network Easy Language (Netzwerk Leichte Sprache) and the appendix of the Accessible Information Technology Regulation (BITV 2.0). The three guidelines are presented with respect to their overlapping and differing information, the rules they share and the areas they focus on as well as their blind spots. Germany also has scientifically founded Easy Language rules that are outlined in this chapter. The second part of the chapter is dedicated to the features of Easy Language: its general characteristics

and its features on the word, syntactic and text level, while also discussing problematic regulations and rule conflicts. As is shown, Easy Language is problematic in multiple respects: that which is helpful for perception might interfere with comprehension. That which is helpful for the target groups on the lexical level (for example, word explanations) might be harmful on the text level. And furthermore: Some features that enhance perceptibility and comprehensibility prove to be harmful to acceptability as they make Easy Language texts visibly different from the standards in established text and discourse practice. This may even lead to stigmatisation processes that single out the target groups as the groups who do not understand or who are contributing to the corruption of the standard language.

Chapter 4 focusses on **Plain Language** and its German equivalents: Could Plain Language be the solution to the acceptability problem? As a matter of fact, Plain Language appears to be much more acceptable than Easy Language as it blends in with the standard and is not in opposition to the text and discourse expectations of the general public. Plain Language is therefore not stigmatising for the target groups. On the other hand, Plain Language is not perceptible and comprehensible enough to serve as the only means to secure communicative inclusion for people with communicative disabilities. Chapter 4 describes Plain Language approaches on an international scale by giving typical examples for manuals and guidelines. It also elaborates on the German Plain Language equivalents like “Einfache Sprache” (“simple language”) and “bürgernahe Sprache” (“citizen-oriented language”). It proposes a model for Plain Language that strategically doses comprehensibility by envisioning Plain Language as a chest of drawers: the upper drawers contain the linguistic means that are suitable for Easy Language and the lower you get, the more complex the linguistic means become. This model can be used to strategically chose from the drawers thus creating texts that are tailor-made for the needs of the target audience. The chapter closes with a short summary on the comprehensibility enhanced varieties presented so far.

Chapter 5 is dedicated to the various groups of people involved in discourse around Easy and Plain Language and their different roles as text creators, text users or bystanders. Text creators are Easy and Plain Language interpreters and translators, Plain Language text authors, accessibility activists and text assessors from the primary target groups. The chapter looks into their profiles, skills and qualifications. Easy Language text creation is placed in the context of

intralingual (and partly intersemiotic) translation together with other forms of interpreting and translation in the context of communicative accessibility. Unlike Easy Language translation, Plain Language texts are often created not by text experts, but by domain experts, which tends to have implications with regard to their accessibility. Accessibility activists usually produce accessible communication without previous training as a personal effort to contribute to communicative inclusion. The role of the text assessors from the primary target group is considered to be especially important for Easy (but much less for Plain) Language. The chapter also discusses the fact that not only the primary target groups, but also domain experts like administration officials or medical staff need Easy Language for their professional interaction with the target groups. And lastly, the chapter looks into the complicated mechanisms of indirect address: Easy Language texts are indirectly addressed to the broad public, and with varying intentions and results.

Chapter 6 considers the **stigmatisation processes** to the detriment of the primary target groups. Communication impairments are considered a stigma and Easy Language, especially if it is perceptibly different from the standard, can trigger or negatively influence stigmatisation processes with regard to the target groups. Chapter 6 shows, based on the findings of stigma research, what role Easy Language can play in such stigmatisation processes and what conclusions might be drawn with regard to the balance between comprehensibility and acceptability.

Chapter 7 is the direct consequence of the results from Chapter 6. It proposes a model variety, **Easy Language Plus (EL+)**, that balances perceptibility and comprehensibility on the one side with acceptability and the risk of stigmatising the target groups on the other. Easy Language Plus is modelled along a line of criteria deduced on the basis of research and the previous chapters of this book.

Chapter 8 summarises the main results, offers a short conclusion and indicates the outlines of further research.

1 Accessible communication

1.1 General outlines

Accessible communication is an issue that is being treated with a high priority in many countries. It is not restricted to inclusion for people with disabilities. As is shown, in our sophisticated world of specialists, we are surrounded by experts who speak or write in expert languages all the time. We are also surrounded by a myriad of dysfunctional texts that do not address users in a way that allows them to properly understand or use the information derived from the texts despite their dysfunctionality. The ability to cope with dysfunctional texts varies according to the communicative resources available to a person. Access to communication is at stake not only for people with communication impairments, but for all people whose communication requirements are not met in a given situation.

Making expert communication accessible requires an effort that has to be taken into consideration: the stressed-out physicians in a hospital might not have the necessary resources to attend to the communicative needs of their patients, especially if these needs are markedly different from the average patient. Many experts speak on expert matters in expert language. On the other hand, there is a great diversity of communication needs: a text (spoken or written, signed or visualised) can have multiple barriers, depending on the profile of the text users.

Users have diverse needs with regard to

... the perceptibility of information: Blind users cannot process visual information, hearing impaired users cannot process auditory information; deaf-blind users are dependent on tactile information. Especially among senior citizens, there is a multitude of people with reduced vision or hearing that are principally able to process visual or auditory information as such, but will need enhanced or enhanceable versions. At the same time, they are mostly not able to process sign language or Braille, and have needs that differ from those of other groups with sensory impairments.

... **the comprehensibility of information:** Non-experts of all kinds will not access information in a language they do not understand, be it because they are learners of a new language or because the text is in expert language. They may not understand (or recall the information later) because the information rendered is too new and unforeseen, or too abundant for them to process. They may not be able to understand (or recall) because the situation in which the information is presented to them is too stressful or because the subject of the message is simply too abstract.

... **the retrievability of information:** There are various media realisations of information – face-to-face communication with or without further written material (for example, illustrative material or a form that is filled in jointly), print, online, audio or audiovisual formats etc. They are accessible through different types of channels, they do or do not require that the users be in possession of technical gadgets like smartphones, computers, mouse or use information storage and distribution facilities like libraries, bookstores, etc. Users will only be able to access information if their communicative needs are met, and these strongly deviate with regard to factors like age, socioeconomic status, disability profile, and so on.

... **the sign codes used:** The message of the text may be conferred in standard language, Easy¹ or Plain Language, pictograms, visualisations of all kinds, Braille, sign language etc. Users will only have access to a limited scope of these sign systems. If the message is coded differently, they will not be able to access it.

The reasons why users have enhanced needs with respect to perceptibility, comprehensibility, retrievability and acceptability of texts and information may (but need not necessarily) be the result of

- ... their disability or impairment,
- ... their different cultural backgrounds,
- ... their socioeconomic status and age group,
- ... their non-comprehensive language or reading skills,
- ... the effort they are willing to make in order to access information, etc.

.....
1 What I call “Easy Language” is often referred to as “Easy-to-Read”. In Chapter 2.2 I will argue why the term “Easy Language” is more appropriate.

What all these parameters have in common is that communication is not accessible if it does not meet the needs of the target groups.

Even though the need for accessible communication is not restricted to people with disabilities, disability as a reason for communicative exclusion is an issue many people (and political leaders in many countries) have become aware of. People with disabilities have rights with respect to accessible communication. In the wake of the UN Convention on the Rights of People with Disabilities (UN CRPD), many countries have shifted their attention to communicative inclusion as a way to promote overall inclusion for people with disabilities. In the discourse surrounding communicative inclusion, it has become evident that other groups without disabilities also profit from accessible information. Texts are often barriers in a concrete situation, not only for people with disabilities. If accessible communication is available, it tends to be used by very different people and in very different situations:

Subtitles for the Deaf and Hard of Hearing grant access to audiovisual material for people with hearing impairments. But they are also welcome in situations where no audio is available, for example broadcasts with subtitles in noisy public spaces such as bars or airports.

Audio descriptions of films allow blind people to follow cinema or television programmes. But the technique to describe or comment on visual information is also used in audioguides that are omnipresent in museums or for sightseeing and are used by people with and without disabilities (for example, language learners).

Accessible websites designed according to the requirements of the Web Content Accessibility Guidelines (WCAG 2.0) are necessary for people with all kinds of disabilities (visual, hearing, motor impairments; with a further emphasis on people with comprehension difficulties in the WCAG 2.2). But accessible design that is, according to the demands of the WCAG 2.0, perceivable, operable, understandable and robust is also helpful for people using small screens or, in general, devices that deviate from the standard.

On the other hand, disabilities may require special realisations with regard to perception, comprehension, and information retrieval that make the product of accessible communication non-accessible, except for the specific group it is designed for. Sign language, for example, is accessible only to the group of

people that have actively learned it. This group is comparatively small; in Germany, it comprises around 80,000 people – roughly 0.1% of the population. Texts in sign language exclude all other text users. Sign language is part of accessible communication only insofar as it grants access to communication for a group that is otherwise excluded. It is not a tool for general accessibility.

This is obviously no reason to renounce sign language as a tool of accessible communication but merely a reminder that sign language alone is not enough to address the needs of people with hearing impairments. So what is needed is an overview of the barriers texts might represent for the different target groups as a basis for translation and modification work to make content accessible. This is the subject of the next subchapter.

1.2 Barriers in communication

To people with communication impairments, texts (in the broad sense comprising oral as well as multimodal forms) may represent barriers in many different ways. These barriers do not allow them to access the content. More comprehensibility in language is not the only required tool to overcome these barriers. Therefore, Easy and Plain Language are part of the broader field of accessible communication. In order to understand how texts in Easy and Plain Language have to be shaped, it is first important to understand what kinds of barriers persons or groups with certain types of disability face when accessing information.

This is not a question of user deficits, but rather of the textual qualities that are required in order to grant access: If users cannot perceive and understand a text offer, it is the text that does not meet their requirements. So the question is what quality a text offer has to have in order to allow people with special needs to access it.

Rink (2019, 2020; building on Schubert 2016 and Jekat et al. 2014) offers an approach that helps understand the types of barriers that the different target groups face: The profiles of the recipients will provide evidence in terms of the type of barrier a text will present. In the following, I present Rink's barrier types:

- 1) A text can represent a **sensory barrier**, for example, if it is oral and the recipient cannot hear.
- 2) It can represent a **cognitive barrier**, for example, if the content is too abstract for the recipient to process.
- 3) It can represent a **motor barrier** if its physical shape is not appropriate for the users, for example, if the pages are too thin for the user to grab and turn or if an online page cannot be navigated without a computer mouse. This one is especially interesting, because it shows that even motor disabilities may impede access to communication. Research often focuses on single impairments and frequently does not consider that people may have multiple disabilities.
- 4) A text can represent a **language barrier**, for example, if it is in a language that the recipient does not understand.
- 5) It can represent an **expert knowledge barrier** or **expert language barrier** if the text presupposes special knowledge or uses specialized language that the recipient is not familiar with. For some text types, especially in expert communication, blank forms for example, are expert knowledge and expert language barriers to almost everybody and not just to people with disabilities. Those two barriers often appear together, but they are technically independent: A simple matter dealt with in expert language can be inaccessible to people without knowledge of the terminology used or who are incapable of processing the complex syntactic structures. In turn, an expert matter exposed in a text can be so intrinsically complex and rich in presuppositions that it cannot be processed irrespective of how simple and down-to-earth the language is.
- 6) A text may represent a **cultural barrier** if it presupposes knowledge or attitudes belonging to a certain culture that are potentially not comprehensible or perhaps not acceptable.
- 7) A text may represent a **media barrier** if its media qualities or means of distribution are not accessible to or used by the target audience. Senior citizens or people with cognitive impairments are, for example, less likely to access online material; people with disabilities living in facilities may not have access to electronic devices or wifi or a membership subscription to access media offers. Perhaps they are not used to accessing platforms they technically have access to or do not expect to be addressed via certain communication channels. Some aspects of the media barrier also relate to the type of information that passes through a certain sensory channel: as many prelingually hearing impaired people are poor readers, written information can be a barrier for

them (that is, a media barrier and a language barrier, as the language of the text is not their first language, Hennies 2019), even if the visual channel is unimpaired. The default means to overcome this barrier is sign language, for example as an insert in the corner of audiovisual texts.

- 8) In addition to Rink's (2019, 2020) barrier types, Lang (in preparation) postulates another barrier: the **motivational barrier**. In this case, the individual is prevented from attempting to read a text because of negative previous experiences with other instances of the same text type. Or if the text provokes rejection in some parts of the target groups, making it difficult or impossible for them to use. Texts can represent a motivational barrier if they are not acceptable to the target audience, if they are intrusive or impolite, if they are discouraging in any way, or if the target audience has had negative previous experiences with similar texts that prevent them from daring to explore a concrete text in a given situation. Illuk (2009: 53) points to the fact that motivation, love of learning and attention focus may be negatively affected if persons with low reading skills have experienced previous failure and develop negative emotions that consume the cognitive capacities needed in the current reading situation. The result may be a defensive attitude that makes information retrieval from written sources impossible. The same can result from negative experience in a certain field of action, for example in exchange with public authorities.

The idea is that, in order to make communication accessible, the barriers that prevent access to the content have to be removed. The prerequisite to removing the barriers is to have better information about which groups react to the different text features and in what way. The text-centred approach to removing barriers, thus, requires user-centred findings to identifying barriers and possible solutions (see Hansen-Schirra/Maaß 2020a).

Rink's (2019, 2020) barrier type model does not only apply to communication products directed at people with disabilities. Texts may represent barriers for anybody. This is very often the case in expert communication, for example, in the legal or medical fields. The respective texts may be incomprehensible – if not for legal or medical experts; they rely on expert language and/or expert knowledge that is a barrier to most people in this respect. This is even more the case in stressful communication situations that reduce the attention span and focus of the target audience. Very frequent are language barriers: They are, in fact, the classical reason for translation. If a text is in a language the target audience does not understand, it has to be translated (Hansen-Schirra/Maaß 2019).

The barrier approach is a new form to conceptualise translation (Hansen-Schirra/Maaß 2019, Maaß 2019b): according to the traditional concept, translation means transferring content from one language to another. But the reason for this transfer is usually that the source text represents a barrier for the target audience, and not necessarily a language barrier. Here are some examples where translation is carried out to overcome sensory barriers (see Maaß/Hernández Garrido 2020):

In **Subtitles for the Deaf and Hard of Hearing**, a sensory barrier has to be overcome, making it necessary to transfer auditive information (dialogues, noise, music) into visual information (subtitles).

In **audio description**, it is again a sensory barrier that impedes people with reduced vision from accessing visual information; it is thus transferred to auditive information (a description of what is to be seen).

In **speech-to-text interpreting**, spoken information is transformed into written information, again eliminating a sensory barrier.

These forms are included in the concept of translation; they are forms of translation; they are researched in the domain of translation studies – very much the same way as Easy Language translation.

Easy Language translation is applied if text offers in standard variety are not comprehensible for the intended audience. The source text might be too technical, contain too many presupposition or too much information. The source text will usually represent an expert knowledge and expert language barrier; for some target groups, it will represent a cognition and/or a cultural barrier; depending on its mediality, it may represent a media barrier, and so forth.

The number and type of barriers depend on the needs of the target audience, and these needs are mainly influenced by the nature and profile of their disability. Rink (2020: 31ff, 142ff) describes different types of disabilities and the typical influence those disabilities have on text reception. In order to make a text accessible, all barriers have to be addressed. The nature of disability may lead to a text containing multiple barriers. In order to make this text accessible for the target groups, the translator has to remove the different types of barriers (for applications of Rink's 2020 barrier index see Keller 2020b and Maaß/Hernández Garrido 2020):

Barrier type		Target Audience (non-experts with and without disability)							
		Unimpaired	Visual impairment	Prelingual hearing impairment	Cognitive disability	Dementia	Aphasia	Learning difficulties	German as a second Language
Sensory barrier		0	1	1	0	0	0	0	0
Cognitive barrier		0	0	0	1	1	0	0	0
Motoric barrier		0	0	0	0	0	0	0	0
Language barrier		0	0	1	0.5	0.5	1	0	1
Cultural barrier		0	0	1	0	0	0	0	1
Expert knowledge barrier		1	1	1	1	1	1	1	1
Expert language barrier		1	1	1	1	1	1	1	1
Media barrier	phonic	0	0	1	0	0	0	0	0
	grafical	0	1	1	1	0	0	1	0
	medium	0	1	1	0	1	0	0	0
Barrier index (BI)		2	5	8	4.5	4.5	3	3	4

Table 2: Barrier types and profiles of target audience; barrier index (Rink 2020: 143, my translation)

According to Rink (2019, 2020), the different barriers together constitute a barrier index that indicates the amount of necessary action in order to make the text offer accessible. This action is related to the specific needs of the different target groups. The motivational barrier potentially applies to all target groups and is dependent on the individual's previous experiences in certain fields of action.

1.3 Features of accessible communication: an overview

Texts can be barriers in different ways, and barriers have to be removed in order to make information accessible. These are the features the accessible texts must have in order to grant that access (Maaß 2019a, b, Maaß/Rink 2019b):

- **Retrievable:** Text users have to be able to **retrieve** the text offers.
- **Perceptible:** Text users have to be able to **perceive** the text offers using the sensory channels they have at their disposal.
- **Comprehensible:** Text users have to be able to **comprehend** the text offers.
- **Linkable:** Text users have to be able to link text offers to previous knowledge in order to **recall** the information.
- **Acceptable:** The information must be offered in a way that text users are able to **accept** the content.
- **Action-enabling:** The information must be given in a way that enables the users to **act** on its basis.

Each of these steps has to be managed by the working memory, which has only a limited capacity – in all people, but even more so in some of the Easy Language target groups (for the role of the working memory in the comprehension process see Fischer 2011: 133 recurring on Just/Carpenter 1992; for a discussion with regard to Easy Language, see Bredel/Maaß 2016a: 120ff).

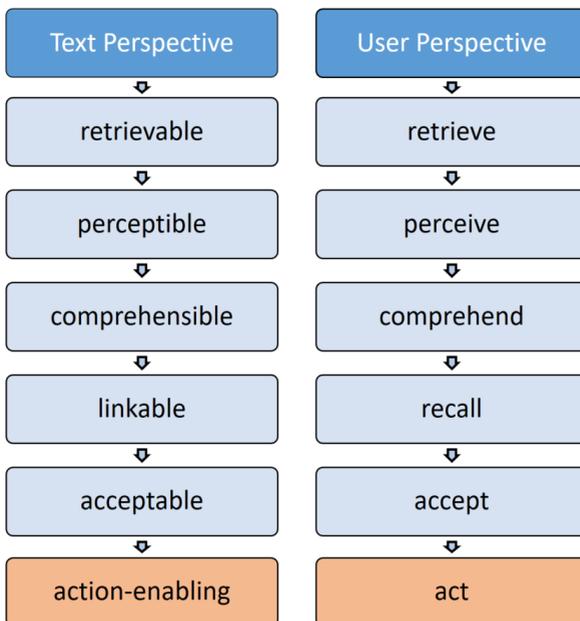


Figure 2: Accessible communication: Text and user perspective (slightly modified from Maaß 2019a: 7)

There is always a text and a user perspective: Texts must have certain features in order to enable users to perform in the described way (Maaß 2019a; Maaß/Rink 2019b: 24). What is important is that users must be able to master all the steps displayed on the right side in order to get to the point that enables them to act on the basis of a text. That is, they will not be able to act on the basis of information that they have derived from a text if they fail on one of the previous steps. The steps build on each other. A text that

- ... has not been previously retrieved cannot be perceived.
- ... cannot be perceived cannot be understood.
- ... cannot be understood cannot be connected to previous knowledge and recalled.
- ... cannot be connected to previous knowledge and recalled cannot be actively accepted as a basis for action.
- ... is not accepted as a basis for action cannot be the basis for action.

In order to enable the target groups of accessible communication to access information and take it as a basis for their decisions and actions, texts thus need to be retrievable, perceptible, comprehensible, linkable, acceptable and action-enabling (Maaß/Rink 2019b; Rink 2020, Maaß 2019a; advance organisers might be helpful in respect, see Christmann/Groeben 2019). Accessible communication will only succeed if the texts do not fail the audience on any of those steps.

The two perspectives – text perspective and user perspective – are not identical, but they are complementary. In order to produce successful products of accessible communication that exhibit the necessary qualities to gain access, “we need to know what our target groups ...

- are able to find,
- where they are searching,
- in which media and environments,
- what they are able to perceive, process and understand,
- what they are able to retain.
- What they find acceptable.
- How they act on the basis of such accessible information.

And we need to know ...

- how texts or accessible media products can be placed,
- how they can look or sound,
- what language and text qualities they should have
- and which translation strategies have to be applied to get those effects.” (Maaß 2019a: 7f)

In order to get hold of the text properties as well as the user needs, comprehensive research is needed. This research will have to be interdisciplinary and multi-methodical (for an overview of text- and user-centred research, see Hansen-Schirra/Maaß 2020b).

1.4 A closer look at the individual pairs of features

1.4.1 Facilitate retrieval through retrievability

“[T]he user is the central component of the information retrieval system” and this view has to be incorporated “in the design of information retrieval systems” (Belkin 1993: 55). People interact with texts “in order to know about our world, to be entertained, to understand, to learn, to become informed, to do our work, to help us solve our problems”; they are “active seekers of texts, and active constructors of meaning from these texts” (ibid.). Belkin points out that information-seeking behaviour has to be identified and supported in order to enable people to retrieve and use information (Belkin 1993).

People with communication impairments are usually not the focus when information retrieval systems are designed; their ability to anticipate and request information is not identical to the average user without impairments. The ability to retrieve information requires the ability to seek this information; on the user side, there are in this respect, correlations with sociological variables such as age, socioeconomic status or group membership (Maaß 2019a: 14, see below), but also with individual factors like previous experience with information resources, nature and extent of the impairment, and personal preferences.

With regard to the target groups with impairments, retrievability of the information offers is closely related to the groups’ media preferences:

- What media or what platforms do the target groups prefer and have access to?
- Do they have access to the necessary devices and infrastructure that is needed to access the information offer?
- Do they have the skills to use these devices and platforms and if not, do they have access to instruction or at least the necessary assistance?

The German disability legislation defines such “information and communication facilities” as “accessible” if they are “detectable, accessible and usable” to people with disabilities “in the usual manner, without particular complications and generally without external help” (BGG 2002: § 4, Chapter 2.3.2, my translation). Products of accessible communication would therefore have to be directly retrievable by the users without any assistance. To require assistance for access includes a limitation of the originally intended right.

With regard to Easy Language, the aspect of retrievability is rarely ever taken into account. This is problematic, as the target groups can only use texts they can find.

Retrievability is linked to the mediality of the text offers, to their distribution and location (Maaß 2019a: 16ff). Each of these factors are dependent on factors like age, socioeconomic status, group membership and the nature of the disability on the user side:

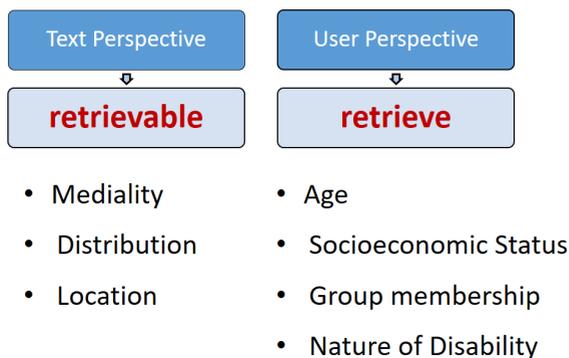


Figure 3: Factors influencing retrievability and retrieval of information (modified on the basis of Maaß 2019a: 16)

People of different age groups have differing media priorities, for example:

- printed vs. online newspaper
- newspaper vs. social media news feed
- information retrieval via telephone or online
- use of various online platforms

Around the globe, the number of online users has risen sharply in the last years. In Germany, almost 100% of the adults under 60 have access to online information. But in the age group 70+, it is only 52% (D21-Digital Index: 2020: 14). The typical offliners are on average 71 years old, 71% of them have a lower education; and 67% are women. Among the top 5 motivators that could make them open for future online activity, there are three that are linked to comprehension: In the survey, they stated that they would use the internet,

- ... if someone would tell them how it works,
 - ... if using it was less difficult,
 - ... if they better understood the terminology and functions
- (Digital Index D21: 2020: 14).

Among the onliners, there are considerable numbers that use the internet only sporadically; the D21 survey gives the following results:

- 14% offliners
- 4% minimal use
- 30% conservative occasional use (Digital Index D21: 2020: 36)

For people belonging to these three categories, the internet is not or not the preferred information source. The D21 survey does not analyse disability as a factor; but low education and old age are factors that lead to offline preferences with regard to information retrieval. The reservations of the group of senior citizens with regard to online information was one of the results of Guter-muth's (2020) user-oriented survey on Easy and Plain Language, which she conducted with four different target groups: cognitive disability, migration, senior citizens (65 and older) and a control group. With respect to the senior citizen group in her survey she writes:

“The number of seniors who did not own a computer and thus were not familiar with the topic in the sense of usability but also with respect to terminology was considerable. The test persons found it difficult to cope

with terms belonging to information technology like ‘download’ or ‘online platform’. [...] The contact with the medium ‘computer’, which does not form part of the elderly peoples’ everyday life, caused irritations [...]. Many of the older test persons expressed the sensation of being left behind and ignored because they are not able to keep up with digitalization. They reported that very often they were being referred to online pages for more information.” (Gutermuth 2020: 235, my translation)

Disability is another factor that influences media preference and depends heavily on the nature and extent of the disability, the living conditions and socioeconomic status of the persons and that usually derives from or is influenced by the disability.

In their survey on media preferences and media use of people with disabilities, Bosse/Hasebrink (2016) show that radio and television are significantly preferred by groups with various disability profiles, among them cognitive impairments (for a discussion of the terms used, Bosse/Hasebrink 2016: 25).

Medium	Group “learning difficulties”, overall (n = 147)	Living in private households (n = 59)	Living in facilities (n = 88)	Reading skills according to Kuhl, Euker, Koch (2013) (n = 75)	No reading skills
Radio	76	71	79	64	89
TV	96	97	96	93	99
Newspaper	20	29	14	31	8
Internet	48	49	48	62	43

Table 3: Media use of people with learning difficulties, at least several times per week, in % (Bosse/Hasebrink 2016: 98)

Almost 100% of the interviewees consume television on a regular basis; less than 50% do the same with online resources. The preferred internet uses of the onliners in these groups include, again, audiovisual contents like Youtube. Institution homepages (where Easy Language information is often provided) do not figure among the frequent uses of online resources for these groups. In order to reach the the target groups with cognitive impairments, a consequence could be to offer tailor-made content via their preferred media chan-

nels, for example, via cable news or, if online, via Youtube, and not primarily via the non-preferred media channels.

The experts that were interviewed for the survey indicate that online access for this group depends, on the one hand on access to institutional and technical resources like wifi or hardware and, on the other hand, on whether there is sufficient assistance and instruction: Assistance is needed for this target group to use the devices and to find a way to navigate the complex online structures and material of different media realisations. Difficulties are the multitude of offers and information, complex surfaces and confusing choices as well as complex language (Bosse/Hasebrink 2016: 102). Online content is often text-based and requires reading skills (Krüppel 2018: 15). The ability to access online information can also be related to a motor barrier, as devices are, in a literal sense, not always easy to physically handle for the target groups (Zaynel 2017: 226). Efforts are necessary (and are partially being made) to include use of online resources in media education programmes; the target groups show a lot of interest in acquiring these skills, for example, through computer training (Berger et al. 2010: 7). The ability to use a computer is held in high esteem within the community of people with cognitive impairments as it is seen as integral part of adult life and participation in the professional world (Berger et al. 2010: 60). But this valorisation does not mean that considerable numbers of group members can actually retrieve online content without difficulty, even if there are exceptions.

These findings contrast with the fact that most Easy Language offers in Germany are exclusively made available online. This helps reduce production and distribution costs and is based on the assumption that everybody has access to online information. But with regard to considerable parts of the target groups, this is not necessarily the case and thus, these methods of distributions are neither adequate nor sufficient. As we have seen, old age as well as cognitive impairment are related to a lower preference for online information. Easy Language information that is only made available online might serve the formal function of acting according to the legal provisions, as well as the symbolic function of showing an inclusion-friendly attitude. However, it usually does not suffice to fulfil the basic function to grant the target groups of Easy Language easy access to the material.

Seeking information presupposes expectability (Maaß 2019a: 15): The target groups will only seek information if they expect a communication offer at a certain location. At the moment, online information offers in Easy Language are disparate; there is no central entrance page into the Easy Language online

universe. The legal situation may prove helpful here: If people know that they are entitled to these texts and that the material has to be provided by authorities and organisation, they might search for this information – at least if they know how to look for material online. Whether they will be able to find existing offers depends on the mediality, the distribution and the location of the text offer (Maaß 2019a: 16ff).

“Mediality” means the type of media realization: print, cable, radio, screen text, video with or without subtitles or audio description, images with or without alternative text. Here, different realisations are necessary for the different types of user needs: people with hearing or visual impairments need other provisions than people with cognitive or motor impairments.

Therefore, text offers have to be made available in different forms of mediality in order to give access to groups with different needs. Accessibility is not only about Easy and Plain Language: they are parts of other forms of accessible communication like subtitles, audio description, accessible web design, sign language videos, and others (see the contributions in Maaß/Rink 2019a, Bernabé Caro/Orero 2019 and Maaß/Hernández Garrido 2020).

“Distribution” means the path along which the communication offer is delivered to the users. Distribution relates to parameters on the side of the recipient like availability of devices (smartphone, computer, tablet) or the necessary infrastructure (network coverage, access to wifi or to a newspaper subscription, etc.), and takes place via media institutions: book store, newsstand, supermarket or others – the user groups might have different ways to access information. Will they enter a bookstore, and if they do, will they actually go beyond the entrance? Communication offers might be easier to retrieve if they are distributed via the local supermarket or pharmacy, the coffee shops in the neighbourhood, at the doctor’s or via the local community centre. The question of distribution paths is rarely taken in consideration, even if the target groups of accessible communication are often not agile enough to change their daily routines. It is therefore vital to develop strategies on how to distribute accessible communication products in a way that they are retrievable.

“One might say they have to try harder if they want to participate. But it might be in the nature of their disability that they cannot do that. So if we want accessible communication we should try harder to reach them on their regular paths” (Maaß 2019a: 17).

“Location” means where the communication offer is located in the multitude of communication offers in a media institution or platform. The Easy Language books in the possession of my local library are, for example, located on the fourth floor among the books in foreign languages, next to “Dutch Language”: Easy Language (“Leichte Sprache”) is considered a language and consequently, Easy Language books are situated on the shelf with books in other languages. Most probably, the target groups would never suspect to find them there. So if they were to enter the library as a media institution that distributes content of the mediality “print”, they would still have to guess where to search for these books – or they would have to use the computer catalogue. As many of them will have problems using this complex means of information retrieval, they will have to ask the staff – persons with communication impairments that need to master communication processes in order to obtain accessible communication products. Again: good will on the part of the delivering institution, but restricted chances for the target audience to participate independently.

Easy Language online offers are typically located on subpages of an organisation’s websites. In order to access such material, people with communication impairments will have to browse standard language material on the search for the texts that are designed for them. As existing surveys (Bosse/Hasebrink 2016, Berger et al. 2010) consistently show, this is not easy for them, nor is it their preferred way of information retrieval. Federal ministries in Germany are obliged by law to place offers in Easy Language and in sign language in the top right on their homepage. But establishing that as common practice would require making it obligatory. However, the homepage of an enterprise is usually reserved for all kinds of very important information, accessibility not being the only priority they might have.

Retrievability is not specifically an issue of Easy Language texts, even if it is especially hard for the primary target groups of Easy Language to navigate the regular text offers that are not comprehensibility enhanced. It is an issue of accessible communication as a whole.

Retrievability is not the subject of translation studies and ensuring it is not the task of translators; instead, it has to be implemented by the clients and authorities that order the texts and is the research subject of information and media sciences. At the moment, the question of retrievability of accessible communication products for the primary target groups has not received sufficient attention; yet being retrievable is an important precondition of actually being retrieved, this being the precondition of perception, comprehension and the other features that the next subchapters are dedicated to.

1.4.2 Facilitate perception through perceptibility

Perceptibility is a feature of the textual surface that enables the target groups to perceive the information. It is a prerequisite for the following steps: only communicative products that are perceived can be processed. Comprehension is a multistage process consisting of the three stages “perception”, “comprehension” and “recall” that build up on one another: perception is the prerequisite of comprehension, comprehension is the prerequisite of recall. Recall is the prerequisite of information-based action. The entire process has a limited capacity at its disposal; the more of this capacity is consumed on the hierarchically lower levels, the less capacity is left for processing on the higher levels (Iluk 2009: 49; Bredel/Maaß 2016a: 116f). Processing and retention processes are competing for the same, limited resource. This means that problems on the lower levels (that is: difficulty to perceive and process the information) will lead to problems with recall (Iluk 2009: 50; Bredel/Maaß 2016a: 116f).

Perception is directed towards the material realisation of the communication product, i.e., its audio and visual gestalt. Perception means that the text user takes in the visual, auditory, haptic and other features via his or her sensory channels as a prerequisite for processing the perceived information.

Text can be perceived through the auditory or the visual channels (or, in case of Braille or Tactile Fingerspelling/Lorm, via the haptic channel). Standard readers are usually able to read faster than they are able to process information through hearing (Kercher 2013: 85); but blind people or other experienced listeners may train themselves to be able to process a much higher frequency of words via the auditory channel (Bredel/Maaß 2016a: 118).

It is to be supposed that the Easy Language target groups have diverging reading patterns: in terms of quantity (shorter saccades, longer fixations, more regressions, fewer words per minute) and quality (no significant difference in the fixation of function vs. content words, differences in the activation level of word fields etc.) (Bredel/Maaß 2016a: 119f, Rickheit et al. 2010). Standard readers show shorter fixations on words they know and that are activated by the context (Kercher 2013: 73). The diverging reading pattern of the Easy Language target groups necessarily has a strong negative impact on information retrieval: Weak readers decipher single words in a linear sequence before they integrate them syntactically and interpret them semantically within the context (Bredel/Maaß 2016a: 120). As the comprehension process has a limited overall resource, the perception process will consume a disproportionate part of it, leaving less resources for processing and recall (ibid., Gutermuth 2020). It

is therefore reasonable to allocate attention to the aspect of perceiving information and, in turn, to perceptible text design.

Accessible communication is aimed at people with different kinds of disabilities and even multiple impairments. This latter aspect is not yet adequately taken into consideration (Rink 2020: 48ff) as research usually focuses on single impairments: hearing impairment or visual impairment or cognitive impairment etc. In reality, cognitive impairment often goes along with motor and/or visual impairment. And senior citizens, to give another example, often suffer from a hearing impairment as well as a visual impairment, and, at the same time possibly also cognitive impairments due to dementia type illnesses. Products of accessible communication have to be designed to meet the needs of people with such complex conditions within their preferred medialities.

In Easy Language text practice, we encounter two extremes in communication products addressed at the target groups of accessible communication: Products that pay no regard to perceptibility at all and, especially in the Easy Language text universe, products with exaggerated perceptibility. Both strategies may prove harmful to the comprehension process.

Perceptibility is often not adequately addressed even in products that are designed for the target groups of Easy Language. As I point out in Chapter 5.6.3, an exceedingly high percentage of older aged people have reduced vision due to presbyopia and/or cataracts (more than 90% of all people older than 65 suffer from a cataract in at least one eye, see Chapter 5.6.3). Many of them wear glasses and/or undergo eye operations, but not all of them and many of them only after a longer period of bad vision. Nevertheless, many product packagings, instruction manuals, contracts and numerous other texts that include senior citizens in their target groups have drastically low perceptibility. This is even true for many products that are directed primarily to those groups. Perceptibility may simply not be a priority for product designers. The following image shows packages of German dental adhesive cream. There might be some younger clients that need dental adhesive cream or there might be clients who buy these products for their older family members. But the main target group of dental adhesive cream are older people, and they are disproportionately affected by visual impairments. In addition, the packages in the image are in yellow with brown or white writing on them (to be fair: the same company also offers products with packages that have a more perceptible design). As the cataract clouds the eye lense in a yellowish colour, this choice of colour is particularly hard to perceive for the target groups:



Figure 4: Packaging of denture adhesive creams (www.rb.com)

Sometimes, companies refuse to acknowledge that many of their clients are old and need perceptibility-enhanced communication products. With respect to online communication, awareness is rising as organisations like administrations and enterprises have to implement the provisions of EU 2016/2102 (see Chapter 2.3.2), which have been included in national legislation all over Europe. There is even a considerable market potential, if companies open themselves up to the diversity of needs of their potential clients: accessible design and communication can be a selling point.

On the other hand, there is excessive perceptibility to an extent that may be to the detriment of comprehensibility and especially acceptability. Easy Language texts are designed to maximally enhance perceptibility (see Chapter 3.3): A maximally perceptible font with enlarged font size and line spacing. Long words are visually separated with hyphens and mediopoints (this rule applies to German only). Each sentence has to be placed on a new line, dissolving the “texture” of the text and essentially dissolving Easy Language texts into lists (Bredel/Maaß 2016a: 265f). The practical guidelines even try to implement the rule to use images of one and the same source and style for every German Easy Language text.

This may improve perceptibility on a word and sentence level and may facilitate the retrieval of single bits of information. But this strategy, at the same

time, hampers comprehension on the text level. If the word structure is destroyed by hyphens and an upper case in the middle of a word (“Groß-Mutter” instead of “Großmutter” meaning “grandmother” and not: “big mother” as the target groups tend to read; for this and more examples, see Wellmann 2020), the single parts of a word might be easier to perceive, but users will have to semantically reintegrate the word before it can be put into context; Gutermuth (2020) and Deilen (2020) show that this proves to be difficult for the primary target groups. Therefore, enhanced perceptibility actually interferes with comprehension. If the texture is destroyed by dissolving a text into single propositions, it is easier to perceive and comprehend the propositions. But users will have to reintegrate the propositions and comprehend the narrative, the macro-structure of a text section or the whole text: To enhance perceptibility at all cost is potentially harmful to comprehension.

Reading is a bottom-up/top-down process; a standard text, with its layout following expectations and conventions, signals what text type and discourse universe it belongs to and what text function it will probably have. To unify the layout of each single Easy Language text erases this kind of information.

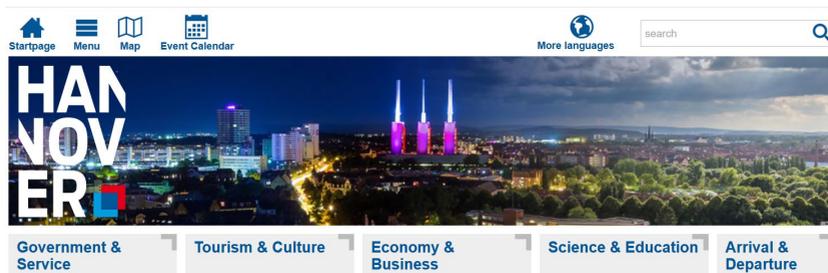


Figure 5: Hannover.de; homepage in English

Figure 5 is a screenshot of the homepage of Hannover, capital of the German Federal State of Lower Saxony, in the English language. We see the skyline of Hannover, the logo consisting of stylised letters that spell out the city’s name, as well as buttons that structure the information offer (Government & Service, Tourism & Culture etc.). Before even starting to read, one can see a visualisation of the actual subject: Hannover. To put a skyline photo or a picture of the marketplace on such pages has become a convention and readers expect certain kinds of information here before even starting to read.

The Easy Language page looks different:



Figure 6: Hannover.de/Leichte-Sprache; homepage in Easy Language

The page provides no visual information on the subject, that is: the city of Hannover. The page does not apply the convention of putting an image of the town on the homepage. The image places the page in the Easy Language universe. It is in fact an image from the Easy Language image stock of the Bremer Lebenshilfe. It is the only image resource on the homepage and, thus, on a visual level gives no information at all on the subject matter. With regard to imagery, Germany follows a particular path: Many texts use images from one and the same source: the bureau for Easy Language in Bremen. They have developed a set of 2000 images and they claim on their website:

“With images, texts are easier to understand. That is why images belong to Easy Language as content-related duplication of the text. These are special images – Easy Language Images. The Bureau for Easy Language has, using resources provided by Aktion Mensch, developed a system of images that is supposed to be the standard for all of Germany. An illustrator develops the images, and testers [with cognitive disabilities, C.M.] check their usefulness and comprehensibility.” (lebenshilfe-bremen.de/angebote/buero-fuer-leichte-sprache/bilder-fuer-die-leichte-sprache/, my translation)²

It is of course impossible to achieve a “content-related duplication of the text” with the same and identical set of 2000 images. Comprehension on the text level is not supported if the same images are used over and over again in very

2 “Mit Bildern kann man Texte besser verstehen. Deshalb gehören zur Leichten Sprache Bilder als inhaltliche Doppelungen des Textes. Dies sind besondere Bilder – Leichte Sprache Bilder. Dafür hat das Büro für Leichte Sprache der Lebenshilfe Bremen mit Mitteln der Aktion Mensch ein Abbildungssystem entwickelt, das bundesweit zum Standard werden soll. Ein Illustrator entwirft die Bilder, TestleserInnen überprüfen ihre Brauchbarkeit und Verständlichkeit.”

different contexts. Imagery and layout give information on the macrolevel and help readers form assumptions on text function and main content.

In the presented case, the website editors used the image for “Easy Language” from the Lebenshilfe Bremen image stock. The image does not reflect the content of the website, not even partly, as the page is about Hannover. The original version provides this information; the Easy Language version cancels it and replaces it with no subject-related information at all. As a consequence, all the information on the subject has to be extracted by reading, because the visual information only points to the fact that the website is in Easy Language and not to the text subject itself. The page is perceptible *as* a page in Easy Language; the use of the images is self-referential. This form of perceptibility enhancement does not contribute to the comprehension of the text subject (for another example, see Maaß 2019a: 29ff).

The actual function of these pictures is not to facilitate comprehension, but to signal that it is a text in Easy Language. The visual layout makes those texts discernible from non-easy texts and might, thus, be favourable to retrievability, but not to comprehension and acceptability. That means, the identifying function comes at a price: The images (and partly also the other layout features, especially the hyphenated writing) distinguish Easy Language texts from “normal” texts. By doing so, they identify their readers as “those who are not able to read properly / those with communication impairments”. As communication impairments carry a stigma, highlighting the diversity of the texts carries the risk of stigmatising the readers of those texts. The presence of visibly different texts might be intended to make the group find “their” texts and also to make the group itself visible. But unfortunately, this strategy provokes harsh dissociation impulses on the part of the secondary and part of the primary target groups: The German strategy to maximally enhance perceptibility of Easy Language texts also maximally enhances stigma (see Chapter 6).

Plain Language does not have that acceptability issue as Plain Language texts are usually not divergent from the standard text layout conventions. This may, however, pose problems to such readers that need perceptibility-enhanced communication. Plain Language may not be perceptible enough for them, which would make them part of the Easy Language target groups.

1.4.3 Facilitate comprehensibility and recall through comprehensibility and linkability

The main goal of Easy and Plain Language is to make content comprehensible and enable the primary target groups to gather information as a basis for their

decision-making. Thus, they need to comprehend and recall. A precondition is that the information they get is comprehensible and linkable to their previous knowledge.

Easy and Plain Language differ with regard to the extent of their comprehensibility, Plain Language being a variety with gradually enhanced comprehensibility and Easy Language being the maximally comprehensible variety of a natural language.

Comprehension takes place on word, sentence and text levels. Comprehending words is a precondition for comprehending phrases which in turn is the precondition for comprehending texts (Richter/Christmann 2002). These bottom-up processes are complemented by top-down processes that entail previous knowledge on text types, discourses, the subject matter as well as expectations towards the individual text. These resources support the comprehension process (Bredel/Maaß 2016a: 118).

Processing and memorising information involves the working memory; if the latter is overloaded, information cannot be stored in the long-term memory (Fischer 2011: 133 citing Just/Carpenter 1992). In this case, users will not or only partly recall what they read. A piece of information that they cannot recall is not useful for them; as a result, information-based action cannot be incited as the comprehension process stops before it is completed. Neither can systematic knowledge build-up take place. Slow, word-by-word reading information intake is a strain for the working memory and a challenge to semantic integration of sequences and text sections. Comprehension on the text level is only possible if those processes are swiftly and successfully completed. Therefore, complexity has to be reduced on each language level in order to not overstrain the working memory or exhaust the capacity of the whole process (Bredel/Maaß 2016a: 121). This is the reason why there are Easy Language regulations that address all language levels. This is necessary to eliminate complexity, that is, morphological, phrasal, syntactic and textual complexity (Gutermuth 2020: 238). The processing capacity needed to comprehend and recall a certain text must not be greater than the available capacity, because otherwise information will not be processed at all or not processed completely (Gutermuth 2020: 239, Bredel/Maaß 2016a: 118f). If the reading process slows down while readers decode difficult text passages, propositions that they have already decoded but not yet stored in their long-term memory will be erased (Iluk 2009: 50). If the text is too complex on any language level and users need longer to perceive and comprehend, this will have negative effects on comprehension and recall. Certain complex structures like complex nominal phrases

or a high number of newly introduced concepts in a single text put information retrieval, comprehension and recall at risk. Readers that do not process words into propositions quickly enough are possibly able to read single words or sentences, but not texts (Bredel/Maaß 2016a: 121). Sentences do not simply add up to texts, but are combined to coherent, meaningful units with a hierarchical structure. Readers build macro-propositions, they are able to get the text message and draw conclusions from what they have read (ibid.), this being an essential precondition for text-based action.

As Christmann/Groeben (2019: 125) point out, reading is not a passive process of *extracting* meaning, but an active process of *constructing* meaning where readers synchronise the text contents with their expectations and interests using their previous language, discourse and subject knowledge. Previous knowledge plays an essential role for comprehension and recall of textual information. The primary Easy Language target groups tend to have a less solid foundation than the average readers that have years of reading practice. This leads to a situation where concepts that are assumed to be known by average readers cannot be presupposed in Easy Language texts as the primary target groups did not have the chance to access information so easily, due to their reading problems and to the lack of Easy Language texts. These unknown concepts will have to be introduced and explained in the Easy Language texts, which makes them longer and more elaborate, a quality that is resource intensive with regard to comprehension and recall.

People might not comprehend concepts contained in the text for different reasons: Sometimes because they do not know the subject as there was no possibility for them to get previously informed for lack of easy-to-understand information. This situation relates to a language barrier and expert language barrier (i.e., not knowing certain words) or an expert knowledge barrier (i.e., not knowing certain concepts). Sometimes though, texts are so rich in concepts that are unknown to the primary target groups that it is impossible for them to compensate the lacking knowledge on the basis of one single text. Some primary target groups additionally face a cognitive barrier. The content may then be too difficult for them to process, no matter how simple its linguistic form is. In both cases, Easy Language reaches its limits. There are limits as to what can be conveyed by an Easy Language text to the different target groups. This is, for example, the case with many texts in legal and administrative communication. They are often too complex to translate in a form that is actually helpful to the target groups and enables independent action (see the striking examples analysed by Rink 2020). Unfortunately, the expectations

clients and readers have for the concept Easy Language are sometimes irrationally high and not backed by facts. This is not a reason to not translate those texts as the target groups are very heterogeneous and the texts might be just right for parts of the primary target groups (for the target groups, see Chapter 5). If texts deal with complex subjects and are rich in propositions, advance organisers can be helpful (Christmann/Groeben 2019: 131f): they indicate the main content and function of the text so that everybody can understand the main ideas, even if not everybody can carry out the action correctly based on the text information.

Research on comprehension and comprehensibility has been very productive for decades (for an overview, see Fischer 2011; Christmann/Groeben 2019). However, most of this research has been carried out with regular or Plain Language texts and with users without communication impairments. It is a major desideratum to research the conditions of comprehension for the different primary target groups of Easy Language (and, in a broader sense, accessible communication). The research group “Simply complex” at the University of Mainz/Germersheim are among the first to systematically explore this field (first research outlines in Hansen-Schirra/Maaß 2020b). On the other hand, we need more insight into how to conceive comprehensible texts that are perceptible, but do not overemphasise perceptibility at the expense of comprehensibility. This is a question that cannot be answered in general as it is bound to different forms of text types and media realisations. It is subject to text linguistics as well as text-oriented translation studies (see, for example, the publications of Maaß 2015, Bredel/Maaß 2016a–c, Rink 2020, Maaß/Hernández Garrido 2020).

1.4.4 Facilitate acceptance through acceptability

Accessible communication and Easy Language have an acceptability issue on different levels. They are related to impairment; some forms of impairment are exposed to stigmatisation processes. Products of accessible communication, especially if they are publicly exposed, can trigger such processes; this is the focus of Chapter 6. In this chapter, the focus is on acceptability for and acceptance by the primary target groups of Easy Language. For people that have problems reading, written texts regularly represent a motivation barrier (Lang: in preparation). The primary target groups have often had years of negative reading experiences, which has a negative influence on motivation and attention (Iluk 2009: 53). They may also have had negative experiences in communication with authorities and the communication they are addressed to:

“They might have been addressed asymmetrically, in a condescending, patronizing way. They might have seen their requests turned down although they had thought to be entitled to public services of a certain kind. They might, in short, have negative presentiments in the face of official communication. Or they might be afraid in face of medical communication and the impact that the information in a text might have on their lives.” (Maaf 2019a: 37)

This may lead to negative emotions that consume cognitive capacities; these capacities then lack in the overall comprehension process, especially if resources are already stretched. Failure and discomfort, especially if experienced multiple times, may develop into a feeling of not being good enough or into a defensive attitude that makes effective learning impossible (ibid.; Bredel/Maaf 2016a: 123).

It is therefore one task of Easy Language texts to make reading as such acceptable. The design strategies with enhanced perceptibility and naive imagery make the texts seem simple and approachable to parts of the primary target groups. The problem is that those same strategies of oversimplification provoke rejection in other parts of the primary and the majority of the secondary target groups – another dilemma at the core of the Easy Language concept.

Plain Language also works on acceptability: Chapter 4.4. shows that the German concept of “citizen-oriented language”, which is close to the Plain Language concept, places its main emphasis on acceptability, while comprehensibility is not in focus.

There is no causal relationship between acceptability and acceptance: a text can be acceptable according to the rules of pragmatics and culture but might nonetheless not be accepted. On the other hand, a text that is not acceptable according to general assumptions can nevertheless be accepted. To work on the acceptability of the products of accessible communication will, however, increase the likelihood of achieving acceptance.

Lucke (1995: 82) distinguishes three dimensions of acceptance:

- to have knowledge of a fact = the cognitive dimension of acceptance
- to consider a fact as correct = the normative dimension of acceptance
- to act according to the knowledge of the fact = the conative dimension of acceptance

According to Lucke (1995: 91f) acceptance is, thus, a complex, multidimensional category and the different layers can come in different combinations. In our model (Maaß/Rink 2019b, Rink 2020), the first dimension is identical with comprehension as a precondition of normative and conative acceptance (Rink 2020: 80), and the third dimension is identical to action-enabling. As Rink (2020: 81) points out, correct execution of a complex action (in her case: subpoenaed individuals showing up in court and claiming their travel expenses) normally presupposes that they understood and accepted the information or instruction material they received (here: the subpoena). If, however, the subpoenaed person does not show up in court, it is not possible to deduce where the problem is situated (Rink 2020: 81):

- Did the person comprehend the subpoena? If not, the problem lies with the cognitive dimension of acceptance, or comprehension.
- Did the person refuse to come, that is, to obey to the summons? Then the problem is situated in the normative dimension of acceptance.
- Did the person comprehend and consent in principle but did not show up anyway, intentionally or unintentionally? Then acceptance in the conative dimension is lacking.

To gain acceptance is an important communicative goal, but quite often, texts are not suited to facilitating acceptance. In this case, they lack acceptability (Rink 2020: 82). Acceptance, especially conative acceptance, cannot be enforced, it is essentially an individual's choice. It can, however, be facilitated by texts that are acceptable (Rink 2020: 82). Acceptability is one of the central textual qualities (De Beaugrande/Dressler 1981). It can therefore be identified in texts, for example with respect to user address, general tonality and asymmetry management. Texts from legal and administrative communication as analysed in Rink (2020) have an inherent asymmetry in address (the institution communicates facts in a top-down manner and gives instructions that have to be followed) that is problematic with regard to their acceptability (and, in turn, acceptance).

While acceptability can be researched on the text basis, acceptance can only be explored in user centred approaches. Both are still essentially lacking for the primary Easy Language target groups (examples are the monographs of Rink 2020 for the text side and Keller 2020 a, b for the user side). As accessible communication is meant to induce action it would be highly relevant to understand the conditions of conative acceptance in the target groups. We can

presuppose that acceptance is the last criterion in the hierarchy of the comprehension process: Contents can only be actively accepted if they are retrievable, perceptible, comprehensible and acceptable. With regard to the Easy Language corpus her analysis is based on, Rink shows that the legal and administrative Easy Language texts are

- expressly oriented towards the readers,
- amenable in tone,
- using the language of proximity,
- polite,
- explicit,
- transparent in the presentation of the facts (Rink 2020: 417).

They try to avoid asymmetry in communication and strive for appropriateness when communicating delicate matters.

Not all Easy Language texts are as acceptable as the texts in Rink's (2020) corpus. Many Easy Language texts also have acceptability issues, the asymmetry in address sometimes not being a problem of the source text but of the Easy Language translation. Many Easy Language texts are patronizing and asymmetrical. This problem is aggravated by the typical layout and imaging conventions especially of German Easy Language texts (see Chapter 6).

1.4.5 Facilitating action through action-enabling potential

Lucke's (1995) concept of conative acceptance is partly identical with the concept of action-enabling as in Maaß/Rink (2019b) and Rink (2020). The idea of accessible communication is to enable independent text-based action. This is only possible if texts are retrieved, successfully perceived and processed and accepted. There is a limit to successful action, if the actions have to take place in expert-lay contexts and require a multitude of concepts that can be recalled and linked, which is often the case in legal and administrative communication, as well as in medical and health communication and other expert contexts. This is a dilemma that is irresolvable in Easy and Plain Language (Rink 2020: 368) but that can be addressed and tackled through text- and user-oriented research as well as experienced expert translators that develop functional Easy and Plain Language target texts.

Accessible communication is the general term that comprises different forms of adaptations and renderings, including interlingual interpreting in sign language, media-related strategies such as audio description for the blind

and subtitling for the deaf and hard of hearing and other strategies that shift information from one perception channel to another, for example supply of audio tracks or speech-to-text-interpreting; for the different forms and strategies see the articles in the Manual of Accessible Communication (Maaß/Rink 2019, the English version of this handbook is forthcoming). The present chapter explored the conditions to establish accessibility in communication. Easy and Plain Language are forms of accessible communication that place an emphasis on comprehensibility, but have to work on the other dimensions as well in order to grant access to content. The following chapter will outline the situation of Easy and Plain Language in Germany; the emphasis is laid on the German terminology, and the legal situation of Easy and Plain Language.

2 Easy and Plain Language in Germany

2.1 Easy and Plain Language as part of communicative accessibility

The UN Convention on the Rights of People with Disabilities lists Plain Language among the measures to make communication accessible, while it does not specifically mention the concept of Easy Language. In the UN CRPD, “accessibility” is a broad concept that comprises, in addition to information and communication, accessibility of “physical, social, economic and cultural environment, to health and education” (UN CRPD 2008: Preamble, 22). The term “accessibility” is defined in a very similar way in German legislation: Article 4 of the Federal Act on Equality for People with Disabilities (“Behindertengleichstellungsgesetz” – BGG 2002) declares “accessible” such “physical and other structures, means of transportation, technical items, systems of information processing, acoustical and visual sources of information and communication facilities”, that are “detectable, accessible and usable” to people with disabilities “in the usual manner, without particular complication and generally without external help” (BGG 2002/2018, Article 4, my translation; see Chapter 2.3.2). As in the UN CRPD, the German BGG defines accessible communication as part of the general concept of accessibility. Unlike the UN CRPD, though, Easy Language is explicitly mentioned in the BGG: Article 11 (Comprehensibility and Easy Language) in the version of 2018 mentions Easy and Plain Language as means to implement communicative accessibility; according to this article, “people with cognitive and psychological impairments” shall receive information, “especially official notifications, general rulings, public-law contracts and printed forms in plain and comprehensible language” (“in einfacher und verständlicher Sprache”), and, if this does not suffice, “in Easy Language” (“in Leichter Sprache”, my translation). I will discuss scope and implications of the German legislation work in Chapter 2.3; what is important at this point is that Easy Language is recognised by the German Disability Equality Act as a form of accessible communication, and that different comprehensibility levels in language – Easy Language / Plain Language – are expressly named and bestowed with implementation rights.

2.2 Questions of terminology: “Easy Language” / “Plain Language”

2.2.1 “Easy”, “Plain”, “Simple”: The problem of connotations

The field of comprehensibility-enhanced varieties of German is structured by the concepts of “Leichte Sprache” and “Einfache Sprache”. “Leichte Sprache” (“Easy Language”) is the term for the variety with maximally enhanced comprehensibility. “Einfache Sprache” is the somewhat more enriched, complex form corresponding to “Plain Language” (see Chapter 4); “Einfache Sprache” literally translates as “Simple Language”.

Leichte Sprache (“Easy Language”) is conceived as a firmly rule-based variety with clear outlines (for a description, see below Chapter 3), whereas Einfache Sprache (“Simple Language”) is seen as a continuum reaching from somewhat enriched forms of Easy Language to forms somewhat below average standard German or languages for special purposes (like legal or medical communication).

The adjectives “easy/plain”, and “leicht/einfach” as in “Easy/Plain Language” or “Leichte/Einfache Sprache” respectively are not without their burdensome connotations; the same is true for “simple”:

Easy: Achieved without great effort; presenting few difficulties	Plain: Not decorated or elaborate; simple or basic in character	Simple: Easily understood or done; presenting no difficulty. [...] Of very low intelligence
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Table 4: “Easy” and “Plain” according to the Oxford English Dictionary

The case of “leicht” (“easy”) and “einfach” (“simple”) in German is quite similar, with the exception that “einfach” also means “single” as opposed to “double/twice”, and the first meaning of “leicht” being “light weight” according to Duden (the German counterpart of the OED):

Leicht: „von geringem Gewicht, nicht schwer“ (“of light weight, not heavy”) „keine große Anstrengung, keinen großen Einsatz erfordernd; nicht schwierig, einfach, unkompliziert“ (“not demanding major effort or commitment, not difficult, simple, not complicated”)	Einfach: „nur einmal gemacht, gefertigt; nicht doppelt oder mehrfach“ (“done or executed just once, not twice or repeatedly”); „leicht verständlich, durchführbar; ohne Mühe lösbar; unkompliziert, nicht schwierig“ (“easy to understand or execute; resolvable without effort; not complicated or difficult”)
--	--

Table 5: “Leicht”; “Einfach”; Duden.de (my translations)

The two term pairs are used to name varieties of different levels of language or text comprehensibility with “leicht” more or less corresponding to “easy” and “einfach” corresponding to “plain”.

Maximum comprehensibility level	Intermediary comprehensibility level	Standard level	Elaborate level
Leichte Sprache / Easy(-to-read) language	Einfache Sprache / Plain Language	Standardsprache/ Standard Language	Fachsprachen / Languages for Special Purposes (LSP)

Table 6: Overview of the German and English terminology

There are several problems related to this set of terms:

- The terms are not self-descriptive and are very similar in scope. They are therefore often confused by the broad public and even by clients and contracting authorities.
- In practice, there are often insecurities with regard to the terms for the standard and elaborate level. Forms of complexity reduction in language, especially if linked to disability, are potentially valued less than the standard or elaborate level. This may lead to the standard version being called “normal version” / “normal language” implying that the comprehensibility enhanced versions are “deviant”. In the German practical guidelines, this results in proposals to deviate from German orthography and grammar rules. Deviation from standard rules triggers hostility from the people outside the circle of primary users that are confronted with Easy Language (see Chapter 2.4 and Chapter 6).
- The connotations evoked by the terms “leicht/easy” and “einfach/plain” are potentially problematic: On the one hand, they tend to belittle the translation effort making it difficult for translators to be taken seriously or charge adequate prices that correspond to the complexity of their task. The terms suggest that anyone can do translation (as it is “easy”); this tends to attract poorly trained bidders without sufficient training to offer their services. This approach is even supported by official websites like that of the German Federal Ministry of Social Affairs whose website for the implementation of the UN CRPD uses the slogan “einfach machen”. This phrase intentionally plays on a double meaning: “making things easy” and “simply do it (and don’t

think too much)”. The intention is to encourage people to strive for more inclusion without too many concerns, but the slogan also suggests that it is easy to implement accessibility in communication. On the other hand, “easy” suggests that texts in Easy Language are “lightweight” and irrelevant as opposed to the “serious”, “normal” version.

The English terms “easy” and “plain” encounter very similar problems. Wolfer et al.’s (2015) proposal to use the term “simple language” is not a solution as “simple” implies similar connotations (see above) and the terms “easy” and “plain” are well-established. Easy and Plain Language are connected to concepts like “communication impairment”, “inability to understand the standard” that hamper positive identification (on processes of stigmatisation see Chapter 6).

2.2.2 Easy-to-Read or Easy Language?

The most frequently used English equivalent of Easy Language is “Easy-to-read” (in Australia, the term “Easy English” is used instead, see Basterfield 2019). Another term is “Easy-to-understand language”; this latter term is used as an umbrella term for comprehensibility-enhanced varieties of natural languages, that is, for Easy and Plain Languages (Perego 2020; Arfé et al. 2018).

But there is one decisive difference between the German and the English terminology with regard to Easy-to-read: While the terms “Leichte Sprache” (Easy Language) and “Einfache Sprache” (Plain Language) are both located on the level of language variety, this is not the case for the currently used English terminology. “Plain *Language*”, like “Einfache Sprache”, refers to a concrete language variety. “Easy-to-Read”, on the other hand, refers to a quality of written texts that makes it easy to extract content. The same is true for some other languages, where the aspect of “reading” is also part of the concept (for terminology in the different languages, see Perego 2020):

- Lättläst in Swedish (“easy reading”, Bohman 2017)
- lectura fácil in Spanish (“easy reading”, see García Muñoz 2016, González Coín 2016, Becker 2020)
- Easy-to-Read in English

“Plain Language” and “Easy-to-Read” are, however, not situated on the same conceptual level. The term “Plain Language” opens a perspective on the different levels of language:

- morphology
- lexis
- syntax
- text
- pragmatics

“Easy-to-read”, on the contrary, focusses on the question of *reading* information. It can be used to designate such purposes, that is, if Easy Language is used to make information easy to read. But it is a poor candidate to structure the conceptual field of comprehensibility-enhanced varieties, i.e. to designate one of the easy-to-read languages. This inconsistency in terminology between makes it difficult to conceive Easy and Plain as two varieties structuring the field of comprehensibility-enhanced communication. The German terminology does not pose this problem as both varieties are named with parallel terms:

Leichte Sprache (Easy Language) – Einfache Sprache (Plain Language)

I use the term “Easy Language”, even though the term “Easy-to-read” is established and has been in use for decades; see, however, the term “Easy English” used in Australia (see Basterfield 2019) that also focuses on the linguistic variety and not on the medial representation. Easy-to-read should be reserved for cases that deal with reading information (as is done in Fajardo et al. 2014; see the next subchapter). Easy and Plain Language are both landmarks in the field of comprehensibility enhanced varieties that needs to be further explored: Plain Language is a linguistic variety with enhanced comprehensibility, Easy Language is the linguistic variety with *maximally* enhanced comprehensibility. Therefore, I propose the term *Easy Language* for German *Leichte Sprache* as well as for the variety with maximally enhanced comprehensibility of any national language.

2.2.3 Beyond “Easy-to-Read”: Non-reading information input

Substituting the Easy-to-Read term with *Easy Language* has more advantages: Today, contents come in a large variety of media realizations and only few of them require the ability to read. Only parts of the target groups actually read texts; some of the main target groups of Easy Language have reading scores well below the average population:

- No more than approximately 30% of the people with cognitive disabilities are readers in the sense of reading texts (Günthner 1999, Ratz 2013).
- Hearing impaired sign language users are often poor readers or not readers at all (see Hennies 2019 for the situation in Germany and Karchmer/Mitchell 2011 for the United States).
- The group of functional illiterates that cannot easily deal with written texts is considerable; across the globe, even in highly industrialised, wealthy countries, people belonging to this group are numerous and often run the risk of not adequately gaining access to vital information, be it legal, medical or other. Migration is one of the leading factors for low literacy: In Germany, 7.3% of all adults who have German among their first languages, but 42.6% of all adults with other first languages belong to the group of the functional illiterates (Grotlüschen et al. 2018: 16). As a consequence, migration background is, for example, one of the leading risks for low health literacy (Schaeffer et al. 2016, 2017).

Also, the non-readers among the target groups need accessible information and have a (moral and partially even legal) right to it. This right is not so difficult to implement, if the text practice in Accessible Communication is not primarily reading-centred: There is a great variety of different media realizations of content and only some of them require the ability to read.

Written online texts can be made accessible through the ear via embedded screen readers or audio tracks (for Easy and Plain Language in audiovisual translation see Maaß/Hernández Garrido 2020, Bernabé Caro/Orero 2019, Arias-Badia/Matamala forthcoming).

Stand: 20.11.2019 14:00 Uhr - Lesezeit: ca.2 Min.

Fach-leute finden viel Kokain



Text hören

In diesem Jahr haben Fach-leute sehr viel Kokain gefunden.

Kokain ist eine Droge.

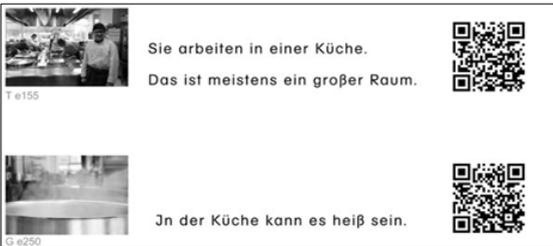
Drogen sind gefährlich für den Körper.

Deshalb sind Drogen verboten.

Figure 7: Embedded audio version of a news text on NDR.de

Translation of the German text in the example:
 Experts find a lot of cocaine.
 This year, experts have found a lot of cocaine.
Cocaine is a drug.
Drugs are dangerous for the body.
Therefore, drugs are prohibited.

Written texts on paper can be connected to online audio resources via QR code.



T e155

Sie arbeiten in einer Küche.
 Das ist meistens ein großer Raum.

G e250

In der Küche kann es heiß sein.

Figure 8: TeilhabeGestaltungsSystem (TGS) des Lebenshilfswerks, s. Bredel/Maaß 2016a: 215

Translation of the German text in the example:
 You work in a kitchen.
 That is usually a big room.
 In the kitchen, it can be hot.

In some fields like sightseeing or museums, Easy Language audioguides are on the rise (for audioguides in museums in the context of accessible communication, see Dobroschke/Kahlisch 2019, Mälzer 2016, Eardley et al. 2016; for audioguides in Easy Language see Scheele 2017).

Some information, especially if deeply embedded in context, can be made accessible through different kinds of imagery like pictogrammes or photos associated or not with reduced forms of written information below the sentence level (single words or short phrases).

Very dynamic and even more professional in Germany, at the moment, is Easy Language interpreting used above all in the context of inclusive meetings and conferences (Schulz et al. 2020).

None of these forms include reading or require the ability to read at the text level. Thus, “Easy-to-Read” is not an adequate term for this language variety as it blocks the view of the different forms of realisation that are necessary to achieve communicative inclusion of the target audience. The term *Easy Language* is open to broader conceptualisations of enhancing comprehensibility through language (for a short outline of media realisations, see Chapter 8).

2.3 The legal situation of Easy and Plain Language in Germany

The legal situation has developed at great speed during the last years. As the German legislation on equal rights and inclusion for people with disabilities is embedded in the European and international legal frameworks, the legal situation is illustrative for other countries as well and is thus, discussed in some detail.

2.3.1 Impulses from the UN Convention on the Rights of People with Disabilities (UN CRPD)

Access to communication for people with disabilities has become an issue in the legal and political discourse in the countries that have ratified the **UN Convention on the Rights of People with Disabilities (UN CRPD)**. The UN CRPD was adopted in December 2006 and was opened for signature in March 2007. The European Union and all the single member states were among the 80 countries to sign the UN CRPD on the very first day (30 March 2007; see United Nations Treaty Collection > Chapter IV: Human Rights). Many more countries have followed since: as of spring 2020, the number of ratifications is

at 181 and the number of signatories is at 163, turning the UN CRPD into one of the most successful UN treaties of all times. On the official UN website, the convention coordinators from the Department of Economic and Social Affairs / Social Inclusion state:

“The Convention follows decades of work by the United Nations to change attitudes and approaches to persons with disabilities. It takes to a new height the movement from viewing persons with disabilities as ‘objects’ of charity, medical treatment and social protection towards viewing persons with disabilities as ‘subjects’ with rights, who are capable of claiming those rights and making decisions for their lives based on their free and informed consent as well as being active members of society.”
(Convention on the Rights of Persons with Disabilities Starting Page)

One central aim of the UN CRPD is inclusion and empowerment of people with disabilities in all areas of society without discrimination. In Germany, the UN CRPD has deeply affected the way in which disability is addressed in the political and legal discourse. Terms of the UN CRPD like “empowerment” (instead of “assistance for autonomy”) or “inclusion” (instead of “integration”) have become part of the political agenda (Degener 2009; Kerkmann 2015: 21; Degener et al. 2015; Bredel/Maaß 2016a: 71ff). In the Preamble to the UN CRPD, accessibility to information and communication is (together with other forms of accessibility) seen as crucial “in enabling persons with disabilities to fully enjoy all human rights and fundamental freedoms” (UN CRPD 2008: Preamble, 22).

In order to establish communicative accessibility, the **UN CRPD focusses on Plain rather than on Easy Language:**

“Communication” includes languages, display of text, Braille, tactile communication, large print, accessible multimedia as well as written, audio, **plain-language**, human-reader and augmentative and alternative modes, means and formats of communication, including accessible information and communication technology.” (UN CRPD, Article 2, 1, emphasis added)

When it came to implementing the UN CRPD in German legislation, the strong impulses from the empowerment of people with cognitive disabilities helped to include Easy instead of Plain Language into the German laws and

regulations. In Germany, accessibility and participation are very important topics and accessible communication has been one of the issues that were thoroughly addressed. The implementation of the UN CRPD is on the agenda of each Federal German State, each municipality, each regional parliament and local authority, and of course also the Federal Government and its public bodies. This movement had begun well before the UN CRPD but was fuelled by the momentum of this resolution. The following sections are dedicated to some landmarks that shaped the legal situation of accessible communication in general and in particular of Easy and Plain Language in Germany. For some general outlines see Kerkmann (2015), Bredel/Maaß (2016: 68ff), and especially Lang (2019).

2.3.2 The situation of accessible communication / Easy and Plain Language in German legislation

Amendment of the German Constitution (Grundgesetz, GG; 1994): In 1994, the German Constitution was amended: It now includes a passage according to which “nobody must be disadvantaged on account of their disability”. This amendment was not very concrete and detailed and does not contain concrete provisions as is typical for the text type. But at the same time, it is the basis for the legislation passed afterwards that expressly regulates participation in all parts of the social and economic life of people with disabilities, and the role of accessible communication.

Volume IX of the Social Insurance Code (Sozialgesetzbuch, SGB; 2001): The first law that expressly addressed the request for Accessible Communication was volume IX of the Social Insurance Code (SGB) regulating rehabilitation and self-determined participation of people with disabilities in Germany through concrete social security benefits. Volume IX originally dates from 2001, but is constantly updated, as are the other volumes of the Social Insurance Code. As of now, Easy and Plain Language are not expressly mentioned. This results not least from the fact that, in 2001, the concept of Easy Language (“Leichte Sprache”) was not yet developed, neither was “Einfache Sprache” as the German equivalent of Plain Language (see chapters 3, 4). To address lay-people in a language more comprehensible to them was rather covered by the term “citizen-oriented language” (“Bürgernahe Sprache”, Chapter 4.4) as a Plain Language equivalent for legal and administrative communication. This term is not commonly associated with addressing people with communication impairments and is understandably not mentioned here.

The provisions in terms of accessible communication in the SGB are of a more general nature: According to paragraph 17.2 of Volume I SGB, people with communication impairments are entitled to use sign language and “other suitable communication aids” when they use social benefits (for example medical examinations). As Lang (2019: 88) states, in accordance with the present legal situation, Easy Language can be considered to be such a form of “suitable communication aid” (my translation; original: “andere geeignete Kommunikationshilfen”) and could thus be claimed under the SGB. In practice though, this is rarely the case.

Federal Act on Equal Opportunities of Persons with Disabilities (Behindertengleichstellungsgesetz, BGG; 2002): The first version of the Federal Act on Equal Opportunities of Persons with Disabilities (BGG) was passed to regulate the relation between citizens with disabilities and the German state administration. Paragraph 4 declares “accessible” such “physical and other structures, means of transportation, technical items, systems of information processing, acoustical and visual sources of information and communication facilities”, that are “detectable, accessible and usable” to people with disabilities “in the usual manner, without particular complication and generally without external help. The use of aids and devices necessary due to disability is permitted” (BGG 2002/2018, Article 4, my translation)³. The BGG has its counterparts in the Acts on Equal Opportunities of Persons with Disabilities for each of the 16 Federal States. In its first version, neither Easy nor Plain Language are mentioned as means to provide communicative accessibility. The same holds true for the Disability Laws in the individual Federal States.

Accessible Information Technology Regulation (Barrierefreie-Informationstechnik-Verordnung, BITV 1.0 – 2002; BITV 2.0 – 2011): The Accessible Information Technology Regulation (BITV) was issued to specify the demands of the BGG for the area of information and communication technology of administrative bodies with the citizens. It extends to websites, mobile apps, e-government tools of all kind and graphical interfaces and evolves along the provisions of the Web Content Accessibility Guidelines (WCAG) of the World

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3 “Barrierefrei sind bauliche und sonstige Anlagen, Verkehrsmittel, technische Gebrauchsgegenstände, Systeme der Informationsverarbeitung, akustische und visuelle Informationsquellen und Kommunikationseinrichtungen sowie andere gestaltete Lebensbereiche, wenn sie für Menschen mit Behinderungen in der allgemein üblichen Weise, ohne besondere Erschwernis und grundsätzlich ohne fremde Hilfe auffindbar, zugänglich und nutzbar sind. Hierbei ist die Nutzung behinderungsbedingt notwendiger Hilfsmittel zulässig.” (§ 4 BGG)

Wide Web Consortium (W3C, www.w3.org). The BITV's first version dates back to 2002 and specifies what kind of measures have to be taken in order to make internet and intranet communication of federal agencies and government bodies accessible.

The amended version, commonly called "BITV 2.0" dates from 2011 and is adapted to the second version of the WCAG (the so-called "WCAG 2.0"). The BITV 2.0 is Germany's first legal text issued by a government body to expressly mention Easy Language: Easy Language has to be integrated, alongside communication offers in sign language, on the homepage of every federal agency with explanations on the content and navigation of the site. What is more, the BITV 2.0 contains specific guidelines for Easy Language with 13 basic rules on how to craft and layout the material, that are described and evaluated in Chapter 3.1.3. The BITV 2.0 has been ground-breaking for Easy Language in official contexts in Germany. It has boosted the development of a market activity in Easy Language translation (Plain Language much less, as we will see). As a result of the BITV 2.0, now every single Federal ministry website in Germany has an Easy Language section (as restricted as this offer may be).

Amendments of the Federal Act on Equal Opportunities of Persons with Disabilities (Behindertengleichstellungsgesetz, BGG; 2016/2018): Since its adoption in 2002, we have seen two amendments to the Federal Act on Equal Opportunities of Persons with Disabilities (BGG). In the version from 2016, a paragraph on *Comprehensibility and Easy Language* (§ 11 "Verständlichkeit und Leichte Sprache") was added. It became effective in January 2018 and stated that official notices, general rulings, public-law contracts and forms (my translation; original: "Bescheide, Allgemeinverfügungen, öffentlich-rechtliche Verträge und Vordrucke") should on request be explained in Plain Language and, if this does not suffice, in Easy Language. The law thus introduces a scale of language varieties with diverging comprehensibility (Plain and Easy Language being explicitly mentioned, while the concept of expert language results from the necessity to translate into more comprehensible linguistic varieties):

- **Expert language** commonly used for the nominated legal text types that are not comprehensible to the intended audience with communication impairments.
- **Plain Language** shall be used on demand in a first attempt to make them accessible.
- **Easy Language** as the ultimate means for comprehensibility.

This scale is consistent with the model proposed above. But there are two very important delimitations:

- 1) As far as the beneficiaries eligible to demand such texts are concerned, they are restricted to people with cognitive and psychological disabilities.
- 2) As to the text types, the regulation is limited to “official notices, general rulings, public-law contracts and forms” (§ 11 BGG, Comprehensibility and Easy Language), that is, legal communication in the strict sense and of a specific kind.

These delimitations on the part of the addressees on the one hand and of texts on the other make it difficult to fill this regulation with life: official notices, general rulings, public-law contracts and forms are not the types of texts that are most in demand among people with cognitive or psychological disabilities or that they can easily handle irrespective of their linguistic shape (see Keller 2020 a, b, Rink 2020). There are also restrictions regarding translatability of legal texts for these groups of people with the goal of making them accessible: Even if the linguistic form of those texts is made maximally comprehensible, the content tends nonetheless to represent a potentially insurmountable cognitive and/or motivational barrier (for the concept of communication barriers, see Rink 2019, 2020, and Chapter 1.2) to groups with cognitive or psychological disabilities.

Still, the regulations of the “Easy Language paragraph” in the BGG were a major breakthrough for the Easy Language movement in Germany and consolidated the Easy Language translation market. In practice, Easy Language currently prevails over Plain Language as the means for communicative accessibility in the German legal context: tendering from public bodies is limited almost exclusively to Easy rather than Plain Language texts. This is probably due to the fact that people with cognitive or psychological disabilities can demand Easy Language if the Plain Language version is not comprehensible enough. For public bodies it is thus safer to go for Easy Language right away. In this vision, Easy Language is seen as the more general solution: people for whom Plain Language is “not easy enough” can be reached with Easy Language. Chapter 2.4 will demonstrate that this connection is not all that straightforward.

National Action Plans for the implementation of the UN CRPD (Nationaler Aktionsplan, NAP 2011/2016): In order to implement the resolutions of the UN CRPD, Germany passed action plans on the different administrative levels. The National Action Plans (NAP) date from 2011 (NAP 1) and 2016 (NAP 2). Although the measures entailed mere declarations of intent and were not binding, their implementation is being monitored and evaluated. Easy (rather than Plain) Language is mentioned more than ten times in each National Action Plan, and concrete measures are listed. Some of these measures (for example integrating Easy Language in the BGG) have already been implemented.

Directive EU 2016/2102 (2016; 2018): This Directive of the European Parliament and of the Council on the accessibility of the websites and mobile applications of public sector bodies was passed on Oct 26 2016 and had to be converted into national law by Sept 23 2018. It does not mention Easy or Plain Language as a means for communicative online accessibility. In Germany, it was implemented through the BGG in its amendment of July 2018. According to this directive, public sector bodies (that is, for example: government agencies on federal, state and municipal levels, universities, churches, chambers of trade etc.) have to provide accessible websites by Sept 2020 (for new offers: by Sept 2019). As of now, the impact of this regulation in Germany is limited; it remains to be observed whether these regulations will result in an amplification of Easy Language text offers.

National Action Plan Health Literacy (Nationaler Aktionsplan Gesundheitskompetenz; 2018): In 2016, the report on health literacy (Schaeffer et al. 2016) revealed that more than 54% of the German population have limited health literacy. The report links poor health literacy to an increased risk for chronic disease. These devastating results led to the National Action Plan Health Literacy (NAP Health Literacy, Schaeffer et al. 2018) being drafted. It states that “the majority of the German population has problems to find, understand, assess, evaluate and use health-relevant information properly” (Schaeffer et al. 2018: 8). One of the measures proposed is to “establish interpreter and translation services, and firmly implement a plain language which is easy to understand and does not create barriers for migrants, immigrants, and refugees” (Schaeffer et al. 2018: 38). The NAP Health Literacy refers to Bredel/Maaß (2016a) as a source to define Plain Language. The addressed public is large, people with disabilities are not expressly mentioned: “Plain Language should adapt difficult texts to the reading abilities of large popula-

tion groups” (Schaeffer et al. 2018: 39). The hope is that accessible health information can help prevent the patients from unnecessary suffering and the social system from unnecessary spending, if people with different needs can access this information and, thus, make informed health decisions.

Further Provisions

There are more provisions in other laws and regulations to grant communicative accessibility for people with disabilities (for an outline, see Lang 2019), for example through the following Acts:

- The **Anti-Discrimination Act** (“Allgemeines Gleichbehandlungsgesetz”, AGG, 2006/2013) that forms the basis for equality between people with and without disabilities in civil law. It was first passed in 2006 and amended in 2013.
- The **Act for Improved Accessibility to Administrative Services** (“Onlinezugangsgesetz”, OZG, 2017) intending to improve access to public services for all citizens. The OZG states that a central online service platform has to be developed for all services on the different administrative levels (federal, federal state, municipal) to be addressed by citizens for all kinds of services. This platform has to be accessible for people with different disabilities and concordant with the respective version of the BITV (Lang 2019: 74f).
- The **eGovernment Act (E-Government-Gesetz – EGovG, 2013)** was intended to facilitate online communication between authorities and citizens; the necessary platforms will be accessible according to the respective versions of the BGG.
- The **eJustice Act (Gesetz zur Förderung des elektronischen Rechtsverkehrs mit den Gerichten, FördElRV, 2013)**, an amendment law to simplify online legal communication and make it accessible to people with disabilities.

To sum up: As far as legislation efforts around Easy and Plain Language are concerned, a lot has been achieved in a comparatively short time, and many people and institutions want to contribute in a lot of different contexts. There is a lot of good will and Easy Language in particular has become visible. Yet, a lot remains to be done and the instruments used to achieve Accessible Communication do not always work well, as we will see in the example in Chapter 2.4.

With respect to the language varieties used to guarantee communicative accessibility, the following picture emerges:

- In the laws and regulations, Easy as well as Plain Language are seen as an instrument for communicative accessibility.
- Plain Language is seen as a means for accessibility of expert-lay contexts and as a means to address people with migration / German as a second language background (see Chapter 5).
- Easy Language is used in the context of inclusion of people with communication impairments (see chapters 3 and 5), with Plain Language envisaged only as a partial solution, as a first attempt.
- Easy Language is sometimes restricted to a rather specific group of users (people with cognitive or psychological disabilities).
- At the same time, there are restrictions as far as text types are concerned. The text types chosen to be translated into Easy Language do not always coincide with the needs and skills of the people addressed (e.g. specialised legal texts in Easy Language for the group of the cognitively disabled).

Currently underway are modifications to the mentioned laws and regulations that need to be made in order to implement the European Accessibility Act.

In many of the laws and regulations, there are rather vague provisions on accessibility in communication, while Easy or Plain Language are not specifically mentioned. To establish a right to Easy Language as a regular means for communicative inclusion in many different contexts is a task not yet fulfilled. In order to implement Easy (or Plain) Language in different societal fields, beyond legislation, jurisdiction is needed: People with communication impairments will have to fight in court for their right to receive Easy Language texts in specific situations (e.g. in classrooms, in court, in the local town hall office etc.). It lies in the very nature of their disability that this will not be an easy path.

2.4 A lot of good will and unexpected pitfalls

As we have seen, there is a lot of good will in Germany to implement communicative accessibility. The policy is, especially in the legal context, mainly directed toward Easy Language, especially in the context of inclusion of people with disabilities. But the following example (also discussed in Maaß 2019a;

some of the following explanations are taken from this text and elaborated) shows that the endeavour to make communication accessible even in that context is quite complex and certainly not easy (for an example of the ambivalent reception of Easy Language in the German press see Diekmannshenke 2017).

In 2015, the Federal State Parliament of Schleswig-Holstein in northern Germany amended its Electoral Law and decided to address all 2.3 million eligible voters with information in Easy Language. The electoral authorities were now

“to provide polling cards, polling card requests, documents for postal voting and polling announcements in Easy Language and the basic information on the election also in other languages” (Electoral Law of the Federal Land Schleswig-Holstein, § 59/19 in the official version of that became effective in June 2016).

This was done as the responsible stakeholders recognised that the regular material in standard German excludes people with communication impairments. Materials in Easy Language, on the contrary, were perceived to be comprehensible to everybody. The idea behind the law amendment was that Easy Language uses only central vocabulary and basic grammatical structures that everybody is able to understand. Some of the addressed people understand only those basic structures and vocabulary, while others understand those basic structures and vocabulary and additionally have access to more comprehensive linguistic and conceptual resources. The law was passed under the assumption that Easy Language would enable the whole population to understand the information. This project is, thus, based on the assumption that Easy Language is the common ground for all people. This idea corresponds to the notion of “universal design”. According to the United Nations’ Convention on the Rights of People with Disabilities (UN CRPD),

“Universal design” means the design of products, environments, programmes and services to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design. (UN CRPD Article 2: Definitions)

Universal design postulates the idea that people should not have to adjust to their environment but that, on the contrary, the environment has to be adjust-

ed to the people and their diverse needs. In this view, Easy Language is sometimes proposed as the new standard, on the grounds that it is easier to understand than the “old” standard and thus includes more people.

The Schleswig-Holstein law amendment follows this view; it was, at first glance, a big success for the Easy Language movement. As provided by this law, at the next occasion, in spring 2017, electoral information and polling cards were sent to all Schleswig-Holstein voters in Easy Language only. But unfortunately, the material in Easy Language was not gracefully accepted by the population in Schleswig-Holstein. It provoked many harsh reactions of the citizens in reader’s letters sent to newspapers and politicians and on different online platforms; just to cite a few examples from the online news platform of the NDR (Norddeutscher Rundfunk / North German Broadcasting Association; the biggest news station in the north of Germany, my translation):

- “I read the content of my polling card with sheer horror.”
- “This measure will hardly foster understanding for people with disabilities.”
- “When I looked at the polling information I felt so silly; as if I were not able to understand my mother tongue. Absolutely stupid!”
- “Really nice how the German language (or better: what remains of it) is butchered more and more. New tales from Absurdistan.”
- “The whole thing is imposed from ‘above’ and personally frustrates me.”
- “My personal consequence: I corrected the whole polling information into correct German and sent it back to the responsible polling authority.”
- “But who seriously believes that more people will show up for the vote only because the texts are written in idiot German?”
- “What is produced here is a mockery of the German language.”

The measure was subject to so much negative press coverage and met with such an extent of public outrage, that soon after, the parliament held an emergency sitting. It decided to amend the Electoral Law again and roll back the changes. The official report on the website of the State Parliament reads as follows:

“The documents dispatched in the run-up to the elections caused irritation among many of the 2.3 million eligible voters. Easy Language has

caused ‘upheaval, incomprehension and alienation’ in the population said Claus Christian Claussen (CDU [Christian Democratic Party]) in the debate put on the agenda per emergency decision, adding that ‘proper German’ was the easiest language for more than 90 percent of the population. ‘Too many people felt alienated,’ confirmed Burkhard Peters (Grüne [Green Party]). An explanation would have been needed. The statements of Kay Richert (FDP [Liberal Democratic Party]), Claus Schaffer (AfD [Alternative for Germany]) and Lars Harms (SSW [South-Schleswig Voters’ Association]) went in the same direction: ‘It is not our goal to reach fewer people, but more,’ said Mr Richert.’ (Landtag Schleswig-Holstein 2017, my translation)

Now, information in Easy Language is made available only online and by explicit request. The problem is that the people that really need Easy Language are clearly not the ones that can easily find information on an official ministry website. Neither are they typically the first to explicitly address public authorities in writing and demand information that is adequate for them in a concrete situation – if they really knew it existed and that they were entitled to have it in the first place.

This case is not untypical. What is interesting is the following:

- The amendment was obviously carried by a lot of good will. This is a very important precondition for inclusion. But this did not (and usually does not) suffice to make it work.
- Although a form of German was chosen that was objectively very comprehensible and should therefore be understood by almost everybody, readers got the impression that *fewer* people were reached than with the standard version. This is evidently not a question of comprehensibility; the idea that if (expert) language barriers are removed everybody is able to pass – basically the idea of universal design –, interestingly did not work.
- The people that were addressed and do not belong to the target groups of Easy Language felt provoked and alienated. This is not what Easy Language is intended to achieve in an inclusive society.
- And finally, the solution found in the end is not helpful at all: The texts do exist, but they are not easily accessible to the target groups as they are not retrievable.

This example shows that it is far from easy to use Easy Language appropriately. Its features are discernible in a way that the texts are experienced as repulsive by standard readers. This may possibly lead to resentments against the target groups, who are in danger of being stigmatised through Easy Language texts (see Chapter 6). In short: Easy Language has a severe acceptability issue. As of now, this aspect has not received due attention.

3 Easy Language

3.1 Easy Language: The practical guidelines

With respect to the codification of Easy Language, Germany is in a unique situation: Not only are there three different practical guidelines:

- one tied to the international rule discussion around Easy Language: the German version of the guidelines of Inclusion Europe (2009),
- one elaborated from the German empowerment movement itself: the guidelines of the Netzwerk Leichte Sprache (2009; “Network Easy Language”),
- and the rule set forming part of a legal regulation on Easy Language: Appendix 2 of the Accessible Information Technology Regulation (“Barrierefreie-Informationstechnik-Verordnung”, BITV 2.0),

there are also scientifically founded rulebooks, one of them published by the Duden, the institution perceived as standard-setting with regard to the German language (Bredel/Maaß 2016a–c, Maaß 2015). And at the moment, the German Institute for Standardisation (Deutsches Institut für Normung, DIN) is working on a unified standard for Easy Language to serve as a basis for public tendering, uniting key actors from research and practice. The publication is expected for early 2021.

3.1.1 The German version of the Inclusion Europe guidelines

The guideline brochure titled “Information for all. European standards for making information easy to read and understand” (title of the German version: “Informationen für alle. Europäische Regeln, wie man Informationen leicht lesbar und leicht verständlich macht”) was published by Inclusion Europe (2009) and contains rules for text production in Easy Language and inclusive events (for a discussion of the Inclusion Europe guidelines see Maaß 2015: 64ff and Bredel/Maaß 2016a: 84ff).

This brochure expressly addresses people with cognitive disabilities; the empowerment groups of people with cognitive disabilities and their families were involved in its creation. The rules were developed in the project “Path-

ways I”, funded by the European Union. This project was dedicated to lifelong learning for people with a cognitive disability. It was aimed to confront the “lack of accessible adult training and information material in easy-to-understand language” (Inclusion Europe 2009, Pathways) and to develop material for easy-to-understand texts in different European languages. The “Pathways” project began in Oct 2007 and ended in Sept 2009. First results were presented at the annual conference of Inclusion Europe from June 24th to 27th 2009 in Tampere (Finland) under the heading “Europe in Action 2009” (a report on the conference is published in “Include” 1, 2009). The project partners came from eight different European countries (Gomez 2009: 8) and worked on standard rules for Easy Language across national languages. Over the course of the project term, different kinds of material on accessible communication for and with people with cognitive disabilities were developed and published in several languages: English, German, French, Finnish, Lithuanian, and Portuguese. The Easy Language checklist was additionally published in Croatian, Czech, Estonian, Hungarian, Italian, Slovak, and Slovenian. These are the materials:

- “Information for all. European standards on how to make information easy to read and understand for people with intellectual disabilities.”
- “Training lifelong learning staff. Guidelines on training people to write documents that are easy to read and understand.”
- “Do not write for us without us. Guidelines on how to involve people with intellectual disabilities in the writing of texts that are easy to read and understand.”
- “Check-list. Is your text easy to read and understand?”
- “Teaching can be easy” (with guidelines for teaching personnel to make their teaching materials and courses accessible).

Most of the materials are in Easy Language (even if the manuals do not follow their own rules consistently). These guidelines are very valuable and are still used as reference for Easy Language text production in different countries (for example, in Finland). What is interesting is that it is obviously possible to formulate Easy Language rules in a way that they expand beyond single natural languages and are applicable for each of the project languages. The manuals contain only very few language-related rules; for German (and only for German), there is for example the rule that long words should be separated by

hyphens. In chapters 1.4.2 and 3.3.3 I go into details with regard to the advantages and drawbacks of the hyphen-rule.

3.1.2 The guidelines of Netzwerk Leichte Sprache (“Network Easy Language”; 2009)

In Germany, the Inclusion Europe manual is not the most commonly used among the practical guidelines. It is by far outpaced by two other guidelines: the rules of the Research Center for Easy Language (“Forschungsstelle Leichte Sprache”, see chapters 3.2 and 3.3 below) and the rules of the Netzwerk Leichte Sprache (2009; “Network Easy Language”), the latter being the most widespread among the practical guidelines in the German context. The Netzwerk Leichte Sprache (2009) guidelines were made public in 2009 on the Netzwerk’s webpage (www.leichtesprache.org). In 2013, they were displayed on the webpage of the Ministry of Work and Social Affairs (“**B**undesministerium für Arbeit und Soziales”, BMAS; the brochure can be accessed under www.gemeinsam-einfach-machen.de); this ministry is responsible for the concerns of people with disabilities. This publication ensured high visibility of the guidelines of Netzwerk Leichte Sprache (2009).

The rules were established with direct participation from people with cognitive disabilities. This group is seen, by Netzwerk Leichte Sprache (2009), as the gatekeeper for Easy Language in all respects, down to the level of each single text. In the view of Netzwerk Leichte Sprache (2009), each single text has to be approved by a group of people with some kind of cognitive disability; on the other hand, Netzwerk Leichte Sprache (2009) does not go into detail about minimum requirements for translators with the consequence that texts are often translated by untrained personnel and then reviewed by a group of people with cognitive disabilities. The review process, though, does not add to the content-related quality of the target text as the group is picked on the grounds that they do not have access to the source text. As far as the target audience is concerned, the Netzwerk guidelines explicitly extend the group of users to the greater range of groups mentioned in Chapter 5, not even limiting it to people with communication impairments (my translation):

<p>Leichte Sprache hilft vielen Menschen.</p> <p>Zum Beispiel:</p> <ul style="list-style-type: none"> • Menschen mit Lern-Schwierigkeiten. • Menschen mit der Krankheit Demenz. • Menschen, die nicht so gut Deutsch sprechen. • Menschen, die nicht so gut lesen können. 	<p>Easy Language helps many people.</p> <p>For example:</p> <ul style="list-style-type: none"> • People with a cognitive disability.⁴ • People with the illness dementia. • People who cannot speak German very well. • People who cannot read very well.
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Figure 9: Netzwerk Leichte Sprache (2013: 16): Target audience of Easy Language

Thus, there appears to be an inconsistency regarding the policy toward target groups as well as the role of text producers that leads to a text practice that is problematic with respect to the acceptability of the texts produced under these circumstances. This inconsistency is linked to the symbolic function of Easy Language and not easy to solve (see Chapter 3.4).

Netzwerk Leichte Sprache (2009, 2013) formulates rules on word, sentence, and text levels; some of them go against standard German spelling and grammar rules; this leads to problems regarding acceptability (see Chapter 6). These rules partly overlap with those of the Inclusion Europe (2009) guidelines and BITV 2.0 guidelines (2011; see below), with some additions as far as the layout is concerned: Netzwerk Leichte Sprache (2009; 2013) proposes using the same layout provisions for all Easy Language texts, no matter what text function, text type and layout tradition. This makes them recognisable as Easy Language texts, but at the same time singles them out from the regular text tradition. As will be shown, this also comes at a prize as far as comprehensibility and acceptability of Easy Language texts are concerned. On the other hand, Easy Language is made perceptible by these rules as Easy Language texts designed according to these layout rules stand out from the discourse practice and make the needs of Easy Language users palpable to standard readers (see chapters 5.8.3, 3.4). Moreover, the layout conventions can be assumed to have a positive impact on retrievability (see Chapter 1.4.1).

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 4 In the German version: People with learning difficulties.

3.1.3 Appendix 2 of the Accessible Information Technology Regulation (“Barrierefreie-Informationstechnik-Verordnung”, BITV 2.0)

The Accessible Information Technology Regulation (“Barrierefreie-Informationstechnik-Verordnung”, BITV) regulates the implementation of the Act on Equal Opportunities of Persons with Disabilities (“Behindertengleichstellungsgesetz”, BGG; see Chapter 2.3.2). Its first version is from 2002, the second is from September 2011. Its full name is “Regulation on the creation of accessible information technology according to the Act on Equal Opportunities of Persons with Disabilities” (“Verordnung zur Schaffung barrierefreier Informationstechnik nach dem Behindertengleichstellungsgesetz”). The second version from 2011 is the first German regulation on the federal level to explicitly prescribe measures for an Easy Language textual practice. Appendix 2 of the BITV 2.0 (2011) contains a description of Easy Language with 13 requirements that Easy Language texts have to meet. It is obvious at first glance that no linguistic experts were consulted when the Appendix was drafted. Other than the two practical guidelines (Inclusion Europe, Netzwerk Leichte Sprache), the rules in the Appendix to the BITV 2.0 (2011) do not have a recognisable taxonomy. Different unrelated linguistic and typographic phenomena are listed at random, partly in the same sentence; most of the requirements, thus, contain several rules (34 in total). This is the first of the 13 requirements:

1. Abbreviations, word truncation at the end of the line, negation as well as subjunctive, passive, and Genitive constructions are to be avoided. (“Abkürzungen, Silbentrennung am Zeilenende, Verneinungen sowie Konjunktiv-, Passiv- und Genitiv-Konstruktionen sind zu vermeiden.”)

Some of the rules are impossible to implement, like the ban on negation; some are highly problematic, like the provision that (all?) compound nouns be segmented with hyphens (“4. [...] Zusammengesetzte Substantive sind durch Bindestrich zu trennen.” = 4. [...] Compound nouns have to be segmented with hyphens.). This rule violates German orthography and leads to texts with sharply reduced acceptability that risk stigmatising the target groups (see Chapter 6). Nonetheless, the BITV 2.0 has been of great importance for the establishment of an Easy Language text practice. It is the first mention and description of Easy Language in the text of a German regulation.

3.1.4 Overlaps and differences between the practical guidelines

In Bredel/Maaß (2016a: 82ff, 2016b: 21ff), we compare the three practical guidelines and show that they establish a total of 120 rules. Only 17 of those rules appear in all three guidelines. Almost two thirds of the total amount of rules appear in only one of the three guidelines and are thus idiosyncratic. The following table shows a comparison between the three practical guidelines (for the single categories, see the table further below):

Total number of rules	120
Number of rules that appear in only one rule set	76
Number of rules that appear in the guidelines of Netzwerk Leichte Sprache (2009) and Inclusion Europe (2009)	18
Number of rules that appear in the guidelines of Netzwerk Leichte Sprache (2009) and BITV 2.0 (2011)	7
Number of rules that appear in the guidelines of Inclusion Europe (2009) and BITV 2.0 (2011)	2
Shared rules in all three guidelines	17

Table 7: Overlaps and differences between the three guidelines (Bredel/Maaß 2016b: 23)

It is of very little wonder that there are differences between the practical guidelines as the rules are basically assumptions based on practical experience in terms of what makes texts easier to comprehend; there is no scientific proof behind them and consistency is not to be expected from such heterogeneous input. Many of the rules, however, are very good guesses and concur unwittingly with the findings of comprehensibility research and other.

On the other hand, a number of the rules from the practical guidelines are not functional – even from the short list of 17 converging rules. This is, for example, the case with the rule on avoiding negation. Even if people with disabilities were really to have problems understanding simple forms of negation (like *no* or *not*), for which there is no sound proof, it is simply not possible to relate facts and events without negation. Negation is a central conceptual category that cannot be ruled out if not at the price of damaging the possibilities to express information at the text level. Therefore, a rule that prohibits the use of negation is not helpful. Supposed that the comprehension of negation does really present a problem for the target audience, translators need advice on how to cope with this problem, that is: which forms of negation are more harmful than others and which forms of negations are to be preferred. What is

needed in such cases is empirical evidence from studies with the target groups (first empirical prove on negation in Easy Language in Bredel/Lang/Maaß 2016; Bock 2017; for an outline of a forthcoming study, see Sommer 2020).

These are the rules that all three guidelines (Inclusion Europe 2009, Netzwerk Leichte Sprache 2009, 2013, and BITV 2.0 2011) have in common:

Visual and medial design	1.	Bigger type-size
	2.	Each sentence on a new line
	3.	No word truncation at the end of the line
	4.	Text is left-aligned
Word structure	5.	Short words
	6.	Separation of compound words with hyphens
	7.	No abbreviations
	8.	No passive voice
Vocabulary	9.	Easy-to-understand words
	10.	Preferably no foreign words
	11.	Foreign words are explained where they are needed
Sentence structure	12.	Short sentences
Semantics	13.	No negation
Text	14.	No lexical variation in the text: same designation for same concept
	15.	Relevant information first
	16.	Clear structure: subheadings are used
	17.	Readers are addressed directly

Table 8: Common rules in all three practical guidelines (according to Bredel/Maaß 2016b: 22)

These 17 rules describe Easy Language quite well. With their help, one can identify a text *as* a text in Easy Language (even if it will most probably contain negation). On the other hand, the rules do not suffice to establish a functional text practice: they state, for example, that sentences have to be short. But they do not indicate how this aim is to be achieved and what a short sentence is. The problem is rather syntactic complexity and the fact that sentences containing complex nominal structures can be short and nonetheless not easy to comprehend (see below Chapter 3.3.4).

What is needed are guidelines that enable translators to create adequate accessible texts that are not only perceptible and comprehensible for people with communication difficulties, but also acceptable to them and the broad public. As will be shown, the question of acceptability is crucial for the success of Easy Language; and yet, as of now this aspect has not been adequately taken into account. Some of the rules proposed – in the short list, it is the rule to segment compound words with hyphens – are a serious obstacle to acceptability (Chapter 1.4.4 and 6).

Table 9 shows that the guidelines regulate the visual and medial design of the texts, but also word structure, vocabulary, sentence structure, meaning, and text. The Inclusion Europe and Netzwerk Leichte Sprache guidelines also enlarge upon the question of how to assess the quality of Easy Language texts.

The majority of the rules can be allocated to the field of media and visual design as well as use of typographical characters: 38 of the 70 Netzwerk Leichte Sprache rules, 45 of the 80 Inclusion Europe rules and 15 of the 34 BITV 2.0 (2011) rules regulate the visual appearance of the texts:

- format
- paper quality
- font and font style
- type-size
- use (or rather: ban) of quotation marks
- line and page design
- use of imagery etc.

In total, 52 of those rules are idiosyncratic, that is, they appear in only one of the guidelines:

	Netzwerk Leichte Sprache (2009, 2013)		Inclusion Europe (2009)		BITV 2.0 (2011)	
	total	idiosyncratic	total	idiosyncratic	total	idiosyncratic
Medial and visual design	28	11	39	23	15	6
Typographical characters to be used	10	8	6	4	1	0
...
Total	70	27	80	42	34	7

Table 9: Shared rules in the categories of layout and visual representation

This shows that there is, as of now, no consent among the practical guidelines on how Easy Language texts should look. In practice, the guideline of the Netzwerk Leichte Sprache is the most influential of the three practical guidelines in Germany. It has a significant impact on how Easy Language is perceived in Germany today. The visual design of Easy Language texts is one of the topics in the focus of the DIN norm that is being drafted at the moment. The team that elaborates the future design rules also includes design experts (first empirical results with regard to layout and visual design of Easy Language are published in Alexander 2019).

The emphasis all three guidelines place on the visual aspect of Easy Language texts is reasonable, understandable, but at the same time problematic:

- It is **reasonable** because a text has to be perceived before it can be processed, linked to previous knowledge and understood. It takes into account the fact that gaining access to texts is not only a matter of vocabulary and syntax. Texts are barriers to readers with communication difficulties, and they are usually more than language and cognition barriers (see Chapter 1.1). That is why perceptibility is one prerequisite of accessible communication.
- It is **understandable** because giving detailed rules on the visual surface of a text is easier than formulating concrete rules on sentence structure or semantics. Thus, the practical guidelines are not very detailed in the thoroughly linguistic categories: Of the 80 Easy Language rules in the Inclusion Europe (2009) guidelines, only one is strictly about syntax, and it is quite general (Rule 14: “Always keep your sentences short.”). The few other rules listed under “Sentences” in the Inclusion Europe (2009) manual are not syntactic rules in the strict sense; they are rather situated on semantics, pragmatics and the text level like the rule on addressing the audience: “Speak to people directly”, or the ban of negation and passive voice.
- It is **problematic** because the three guidelines differ insofar as the concrete rules are concerned, but all three – to a differing extent – aim at visually leveling out texts of all text types making them all look the same. This is probably helpful for retrieval and might be helpful for perception (though we lack empirical evidence to prove that) but it potentially harms comprehension on the text level: Making all texts look the same removes important information that source text readers derive from the visual representation of the text, and thus, text

types. And we have evidence that the corporate design of the Easy Language text universe also harms the acceptability of the texts (see chapters 1.4 and 6). The emphasis placed on the visual appearance of Easy Language texts serves the symbolic function of Easy Language (see Chapter 3.4).

3.2 Easy Language: The scientifically founded rulebooks

3.2.1 Why scientifically founded Easy Language rulebooks?

The scientifically founded rulebooks were elaborated in the context of the Research Centre for Easy Language (Forschungsstelle Leichte Sprache) that I founded in January 2014 at the Institute for Translatology and Specialised Communication of the University of Hildesheim. It is a translation lab with projects from the field of legal, administrative and medical communication in particular, but also many other text types of different medial representations. A number of the translation projects are affiliated with research projects (see, for example, Rink 2020 on legal communication in Easy Language).

From the beginning, it was obvious that the practical guidelines did not suffice neither for consistent text practice nor for research purposes. The practical guidelines are themselves a fascinating object for research: They show good intuition as to what makes information easier to understand as they derive from a participative practice that is well aware of the target groups' needs (with a focus on people with cognitive disability) but do not achieve to appeal to the broader public. On the other hand, it is interesting to see where those rules overgeneralise or underspecify. An example regarding the use of metaphors in Easy Language texts will illustrate the point and show why more systematic approaches are needed in order to generate rules that work and are applicable.

The guidelines of Inclusion Europe (2009) and Netzwerk Leichte Sprache (2009) ban the use of metaphors:

Inclusion Europe (2009):

<p>10. Verwenden Sie keine schwierigen Begriffe wie zum Beispiel Metaphern.</p> <p>Eine Metapher ist ein Satz, der nicht wörtlich gemeint ist.</p> <p>Zum Beispiel: „Es schüttet wie aus Eimern“, statt: „Es regnet sehr stark“. (Inclusion Europe 2009: 10; German version)</p>	<p>10. Do not use difficult ideas such as metaphors.</p> <p>A metaphor is a sentence that does not actually mean what it says.</p> <p>An example of a metaphor is “it is raining cats and dogs”.</p> <p>(Inclusion Europe 2009: 10; English version)</p>
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Figure 10: Inclusion Europe (2009: 10)

Netzwerk Leichte Sprache (2009, 2013) avoids the term “metaphor”, extending the scope even more (the word “raven parents” being a gloss translation of the German metaphor in the example):

<p> Wörter</p> <p>Vermeiden Sie Rede-Wendungen und bildliche Sprache.</p> <p>Viele Menschen verstehen das falsch. Sie verstehen diese Sprache wörtlich.</p> <p>Zum Beispiel:</p> <p>Das Wort Raben-Eltern ist bildliche Sprache. Raben-Eltern sind nicht die Eltern von Raben-Küken. Mit Raben-Eltern meint man: schlechte Eltern.</p>	<p>Avoid idioms and figurative speech.</p> <p>Many people understand that incorrectly. They understand this language literally.</p> <p>For example:</p> <p>The word raven parents (“Raben-Eltern”) is figurative speech. Raven parents are not parents of raven chicks. By raven parents one means: bad parents.</p> <p>(Netzwerk Leichte Sprache 2013: 33, my translation)</p>
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Figure 11: Netzwerk Leichte Sprache (213: 33): Avoid idioms and figurative speech

This ban on metaphors (or even broader: on figurative speech) is based on good intuition: In metaphors like the ones cited above (“raven parents” or “it is raining cats and dogs”), there is a difference between what is meant and what is actually said. Some metaphors are lexicalised and therefore have to be learnt to understand them (“raven parents”). Others may be deduced from the context, but this might require an effort and a cognitive agility that the target au-

dience might not always have at their disposal. Thus, such metaphors might not be easily understood if they are not part of a person's vocabulary or usage. As we know, some individuals among the primary target groups tend to have problems with some types of metaphors if they are not part of their active usage, for example persons on the autistic spectrum or with aphasia. Some metaphors are linked to specific discourses like politics or economy; they are common to people that know those discourses and may not be common to people that do not. For language learners, lexicalised metaphors of the type cited above ("it's raining cats and dogs") are not among the first lexical items that have to be actively acquired and will probably not be understood on their first encounter.

But a general ban on metaphors as formulated in the practical guidelines does not work: Metaphors (and other forms of idiomatic expressions) belong to the basic inventory of every language. Since Lakoff/Johnson's (1980) seminal work at the latest, we know that language – not even Easy Language – does not work without metaphors; that they are deeply rooted in the language system; that they are not even limited to nouns or collocations of nouns, but extend to verbs, adjectives, prepositions. It is simply not possible to avoid the conceptual time-is-space metaphor in time specifications ("Let's meet at 10").

Of course, the rule "do not use metaphors" is not intended to include such cases. But it is not straightforward where to draw a line between metaphors that are or are not acceptable for Easy Language texts. The term "Easy Language" in itself also contains a metaphor (as many terms do, see Mateo Gallego 2020, Baran 2004, Rojo/Orts 2010): language does not carry weight, that is, the adjective "easy" is used metaphorically. "Network" is also a metaphor: it is about people joining forces and not about fishing. So, "Netzwerk Leichte Sprache" ("Network Easy Language") contains two metaphors in a three-word unit. Obviously, the metaphors are not perceived as problematic in this case. Metaphors can, on the one hand, make comprehension difficult. But they can also, on the other hand, denominate what is meant extremely well. And in other cases, they might simply be the only way to express a certain concept – what would be the point or way of avoiding the metaphor in "electric current"?

The impulse to ban metaphors is understandable, because processing metaphors that were not already acquired as part of a person's language usage may be burdensome from a cognitive perspective. But a total ban on metaphors is not feasible. That is, the rule "do not use metaphors" is neither

consistent nor applicable. It is not helpful to tell translators “metaphors might pose a problem”, if no further scrutiny is made as to which metaphors actually do pose problems and how they should hence proceed if they encounter metaphors in the source texts they are about to translate into Easy Language.

Looking more closely, the ban on metaphors blends in with a rule of the type:

“Make sure that the readers do not have to close a gap between what is said and what is meant in your text.”

This rule is applicable for example with regard to:

- ... certain creative, expressive, literary or terminological uses of metaphors and figurative speech: “it’s raining cats and dogs”;
- ... irony: “well done...” used in contexts where the opposite is meant;
- ... indirect politeness strategies: “I am somewhat cold” instead of “please close the window”;
- ... indirect and passive formulations that conceal the acting parties: “Instructions have to be followed” instead of “You have to act as we have told you”;
- ... omissions and presuppositions in the text that require previous knowledge of facts and circumstances by the reader;
- etc.

To conclude: Some, but not all metaphors do sometimes pose problems for the target groups. But to formulate a general ban on metaphors produces an inconsistent and non-applicable rule and does not help translators in any way. Consistent, applicable rules are needed to enable translators to produce well-functioning Easy Language texts. To do so is a challenge, especially for specialised communication texts where the difference between the linguistic inventories (maximally vs. minimally complex, at least on the word and sentence levels) are exceedingly big and the common ground (Clark 1996) between the communication partners (experts in the respective field on the one hand and (lay-)people with communication impairments and a history of non-access to texts on the other) is extremely small (Rink 2020: 173ff). Therefore, intuitive guidebooks and rule sets might be enough to identify a text as an Easy Language text or to set the frame for low profile information texts with everyday

language source texts. More sophisticated rules are needed, though, when it comes to expert-lay communication, if knowledge has to be built up in the target groups in order to enable them to enter a discourse they previously had no access to.

And, what is more, the intuitive guidebooks have chosen a problematic path with respect to the acceptability of texts: Texts that are written according to the German Easy Language practical guidelines tend to have features with low acceptability that potentially stigmatise their audience (see chapters 1.4.4 and 6). This is why a scientific approach to Easy Language is needed: Easy Language and also the other comprehensibility enhanced varieties have to be remodelled and evaluated by empirically testing the properties of Easy Language texts as well as their reception by the different primary and secondary target groups (for first results, see for example Bock/Lange 2017, Gutermuth 2020, Rink 2020 and the contributions in Hansen-Schirra/Maaß 2020b).

3.2.2 The first scientific rule book ("Leichte Sprache. Das Regelbuch", Maaß 2015)

The book "Leichte Sprache. Das Regelbuch" is divided into three parts:

Part I introduces the subject of Easy Language and gives an outline on the legal situation and achievements of the time it was written (2014). It elaborates an example of an Easy Language translation carried out in a project with the Ministry of Justice of the Federal State of Niedersachsen (Lower Saxony). Then, it briefly presents the existing practical guidelines for Easy Language.

In **Part II**, the practical guidelines (Inclusion Europe 2009, Netzwerk Leichte Sprache 2009, BITV 2.0 2011) are evaluated on the basis of linguistic research with regard to their consistency and feasibility. It shows that the guidelines indeed have a good intuition, but that the rules often have to be worked on; they have to be

- generalised, as in some respect is the case for metaphors,
- concretised, as is the case for sentence structure,
- modified, as is the case for word segmentation,
- put into question, as is the case for the visualisation strategies proposed.

Part III presents the Easy Language rules that were followed by the Research Centre for Easy Language (Forschungsstelle Leichte Sprache) at the time. The rules contain a remodelling for complex sentences into a main-clause-only structure with model solutions for the most frequent types of clauses. They are built on the following resources:

- the practical guidelines used from a constructive-critical perspective;
- linguistic research on grammar, text, specialised communication, translation;
- the insights from the translation projects of the Research Centre for Easy Language.

The rules have since been refined through translations projects and affiliated research.

The book was published in January 2015 with the editor Lit (Münster) and is available online in German: doi.org/10.25528/018.

3.2.3 The Duden Leichte Sprache (“Duden Easy Language”)

In Bredel/Maaß (2016a–c), my colleague Ursula Bredel and I joined forces. While Ursula Bredel contributed from the perspective of German linguistics, didactics and reading acquisition, my profile is in applied linguistics, translatology, specialised and accessible communication. The three volumes were published as “Duden Easy Language” (“Duden Leichte Sprache”).

The standard language Duden book is, to this day, perceived as the most renowned authority and reference manual for the German language. The name derives from Konrad Duden who, in 1880, published his *Vollständiges Orthographisches Wörterbuch der deutschen Sprache* (“Complete Orthographic Dictionary of the German Language”) that became the most influential reference book on the German language and shaped the development of a standardised German orthography. Needless to say that the commitment of Duden was a major gain for the shaping and the reputation of Easy Language in Germany.

The Duden Easy Language (Bredel/Maaß 2016a–c) consists of the following three volumes:

- a comprehensive scientific basic work (Bredel/Maaß 2016a),
- a guidebook for the broader public (Bredel/Maaß 2016b) and
- a workbook (Bredel/Maaß 2016c).

The basic work (Bredel/Maaß 2016a) is directed toward the scientific public and, *inter alia*,

- ... depicts Easy Language from a sociolinguistic perspective as a strategically reduced variety of German (for a brief outline of the current state⁵ see Chapter 3.1);
- ... describes how and why Easy Language is considered a provocation to average readers that are indirectly addressed (see Chapter 2.4, 5.8);
- ... outlines how Easy Language can stigmatise the target groups (see Chapter 6);
- ... defines the main functions of Easy Language as a means of accessible communication (see Chapter 3.3.2);
- ... gives background information on the evolution of the concept and on overlaps with neighbouring concepts (like Plain Language, Foreigner Talk, etc.) (see Chapter 4);
- ... delineates the political and legal background of the concept (see Chapter 2.3)
- ... analyses and critically appraises the main guidelines used in text practice (see Chapter 3.1);
- ... gives an overview on perception / perceptibility and comprehension / comprehensibility research situating Easy Language in this context (see chapters 1.4.2 and 1.4.3);
- ... gathers information on the different target groups on the basis of existing research literature on these target groups and argues what features of Easy Language might be helpful for them (see Chapter 5.6);
- ... lays the basis for translation studies in Easy Language by defining Easy Language translation as a subject for intralingual translation research (see Chapter 5.2);
- ... describes the structure of Easy Language on the levels of layout, visualisations and imagery, orthography, morphology, vocabulary, syntax, semantics, pragmatics and text (see chapters 3.3.3–3.3.5);
- ... conceptualises the central structural principles (proximity, maximum explicitness, continuity) and its core functions (comprehensibility and perceptibility) (see Chapter 3.3.2);
- ... drafts a model for Plain Language (see chapters 4 and 7).

.....
5 The Duden trilogy was written in 2015/2016 and was published in 2016. The list gives an outline of the content of Bredel/Maaß (2016a), but the references in brackets in this and the following items point to the chapters or sections in the present book where I deal with the respective topic.

In the three volumes of the Duden Easy Language, we integrated a broad range of scientific approaches to lay the foundations for a scientifically modelled Easy Language.

Again, we departed from the practical guidelines and evaluated them in light of existing research. We relied on research in the different areas and disciplines: An important resource are the works of comprehension and comprehensibility research from a cognitive and psychological background (for an overview, see Fischer 2011) as well as readability research (for an overview, see Kercher 2013). This research has a long history of empirical and text-based approaches and delivers important insights that deliver at least hypotheses for Easy Language and its target groups, even if those studies have mostly not been carried out with test subjects belonging to those target groups or with Easy Language texts. We also relied on research on planned and artificial languages, simplified technical languages and controlled languages (Lehrndorfer 1996, Tjarks-Sobhani 2012; Schubert 2014; Siegel/Lieske 2015) that are an important resource for Easy Language and other comprehensibility-enhanced varieties that are also the outcome of language-planning processes and share some features with other such attempts (for a systematic comparison between Easy Languages and controlled languages see Alkhalil 2015). We looked into reading acquisition of children and people with communication impairments and German as a second language research (Grotlüschen/Riekmann 2011, Heimlich 2009, Haug 2008, Babka von Gostomski 2008). An important source for insight were publications from translatology and text linguistics, especially target situation-oriented, functional approaches (Risku 2016, Holz-Mänttari 1984) as well as approaches targeting translation between different medialities or within the same language system (Díaz Cintas/Orero/Remael 2007; for an overview, see Siever 2010). On the basis of grammar research for standard German and its varieties we were able to formulate hypotheses on what features of Easy Language as described in the practical guidelines will not be acceptable to standard readers. Research on Xenolects, or “Foreigner Talk”, as Ferguson (1971) names it, helped us to understand spontaneous processes to make communication more acceptable: Xenolects are language varieties that are used by natives or advanced speakers to address non-natives. These varieties are significantly reduced in complexity (Sinner 2014), but at the same time strongly asymmetrical and stigmatising (Jakovidou 1993). And finally, we based our suggestions for Easy Language on research carried out with the primary target groups. Such research is helpful to gain insights into the

communication needs and feasible ways to meet those needs. There is research on cognitive disabilities and their restrictions in information processing (Seidel 2013, Günthner 1999, Ratz 2013), on prelingual hearing impairment and its effects on reading (or, more generally, language, Hennies 2009, Krammer 2001) acquisition, on dementia and language degeneration processes (Schindelmeiser 2008, Sachweh 2003, Schecker 2003, Gress-Heister 2003), on aphasia and partial language loss (Tesak 2006, Huber et al. 2006) etc., that is insightful to understanding what features will make texts more comprehensible and how the variety “Easy Language” will thus have to be conceived. It is interesting how some features concur in more than one group: anaphoric pronouns are a hazard for more than one of the target groups, be it because of lacking grammatical knowledge or reduced attention span. Such insights are extremely helpful to understand which features of Easy Language are central and have to be kept, even if they have an impact on acceptability (for a discussion of such features see below, Chapter 7.2).

At the time when we were drafting the Duden Easy Language (Bredel/Maaß 2016a–c), there was already a rich publication landscape on all these topics. But none of them was on Easy Language in the strict sense. That means: The comprehension and comprehensibility research was mainly carried out with unimpaired users and with standard or expert language texts. Planned and artificial as well as simplified technical languages were directed towards people without communicative disabilities or were situated exclusively on the expert text level. Reading acquisition studies were mainly aimed at children without impairments. Translatological studies focussed on interlingual translation, that is between different languages (for transfer to intralingual Easy Language translation see Maaß/Rink/Zehrer 2014, Hansen-Schirra/Maaß 2019, Rink 2020). Studies on Foreigner Talk (Xenolects) did not include disabilities. Text linguistics research is directed toward the whole variation of text types without the strains of Easy Language rules. Grammar research was mainly on standard German and some of its variations (but not on the comprehensibility-enhanced ones). The research on the target groups was indeed partly on the types of constraint that the respective disability or impairment has on processing information of different types, but these works did not encompass the reception of Easy Language.

Even if there was no prior Easy Language research in the strict sense, it was insightful to discover that the findings went in a very similar direction, for example: The results of psychological and numerical comprehensibility research on how a standard language text is to be structured to make it more

comprehensible have the tendency to converge with features of simplified languages of the technical domain and partly also with the intuitive strategies of Foreigner Talk – as well as with the intuitive practical guidelines of Easy Language. Different kinds of disability (like dementia, aphasia, prelingual hearing impairment) boil down to a considerable overlap in language structures being perceived as barriers (for example, anaphoric pronouns are problematic for all of these three target groups). The language features (for example with regard to pronoun use) that are learned the latest converge considerably with those that are first lost in language degeneration processes and are, as a consequence, to be avoided for enhanced comprehensibility. There are primary and secondary target groups with high levels of convergence as far as their need for comprehensibility-enhanced language is concerned (for example, hearing-impaired and migrants/people with German as a second language).

The convergence between the different approaches and target groups are especially major at word and sentence levels; more problematic is the text level, as I will show in Chapter 3.3.5.

The existing research was nonetheless very helpful and allowed us to formulate conjectures and hypotheses on what makes language and texts easy to read and to understand: If you know the issues poor readers without disabilities encounter when confronted with texts, you may deduce how to facilitate reading as such. If you know how information processing works in the brain and what makes information hard to understand for average readers, you may deduce what qualities of a text will most probably not be helpful. If you know what problems users with different communicative disabilities face with standard texts, you can deduce how texts should be designed in order to make them more accessible.

At the same time, there was not yet any scientific proof for those assumptions. We were and are lacking empirical research on Easy Language and its reception by people with different kinds of communication impairments. Therefore, in the Duden Easy Language, we formulated many research desiderata that have to be resolved by studying actual Easy Language rules and texts with the primary target groups; this process is momentarily underway as we are witnessing a vivid empirical research on Easy Language in the German speaking area (see for example Bredel/Lang/Maaß 2016, Bock 2017, Bock/Lange 2017, Gutermuth 2020, Rink 2020, Hansen-Schirra/Maaß 2020b, Wellmann 2020 and more).

The Duden Easy Language is thus a basis for the empirical research that is now underway and has delivered first results. It is the basis I elaborate on in the following Chapter 3.3.

3.3 The features of Easy Language

3.3.1 General remarks

Easy Language is the variety of a natural language with maximally enhanced comprehensibility that is used to address people with communication impairments and communication difficulties, whether they have disabilities or not. It has an unusual profile as a language variety (Bredel/Maaß 2016a: 24ff):

- Its conditions of acquisition and use are asymmetrical (Bredel/Maaß 2016a: 25f): It is produced by professionals, who themselves are not Easy Language users, for users with communication impairments, who themselves are not producers or speakers of Easy Language. It does not form language communities (although it may form communities of practice); it is used in asymmetrical expert-lay communication.
- Full-fledged, rule-consistent Easy Language is restricted to pre-planned communication, hence its origin in making written texts accessible (Bredel/Maaß 2016a: 29). Oral forms like Easy Language interpreting usually veer toward Plain Language (see Schulz et al. 2020).
- Even though it is pre-planned, Easy Language lacks the typical properties of written language (in the sense of linguistic distance), but instead exhibits the features of linguistic proximity (Bredel/Maaß 2016a: 516ff).
- It is a rule-based variety that reverts to purposeful language planning and shows similarities with controlled languages (Bredel/Maaß 2016a: 63ff).
- Its features are designed in a way that is intended to be highly comprehensible for people with reduced perception and comprehension levels as well as limited reading skills (if they are readers at all). Its profile potentially leads to discrimination and stigmatisation of Easy Language users (see Chapter 6).

Easy Language is limited to the use of central, everyday vocabulary with a simple sentence structure and considerable restrictions on morphology (Maaß 2015). There are also restrictions with respect to other grammatical or textual features like subjunctive, passive voice or pronominal anaphora. On the text level, implicatures and presuppositions are made explicit; terms or less common lexical items are explained and background information is given in order to allow the target audience to follow. The argument structure of the texts is very simple. The layout prescriptions are marked; especially for German Easy Language they are very strict:

On the word level, borders between the single lexical items of compound nouns are made visible by inserting a hyphenation point called “mediopoint” (“Mediopunkt” as in *Winter-not-programm* in the NDR example below) or a hyphen (as in *Lern-Schwierigkeiten*, see Chapter 3.2.2; this spelling is, however, not covered by German orthography). There are different approaches regarding which sign to prefer (see Bredel/Maaß 2017 and Chapter 3.3.3 below).

Each sentence appears on a new line (in that sense, they come in the form of a list, Bredel/Maaß 2016a: 491). In this way, texts become more perceptible, but at the same time also longer; and they differ more from their source texts. The guidelines of the Netzwerk Leichte Sprache (2009, “Network Easy Language”) even prescribe the type of imagery that is to be used.

What follows is an example of a news text in Easy Language written by news editors from the Accessible Communication offers’ department of the North German Broadcasting Association (Norddeutscher Rundfunk; NDR). The texts of the NDR do not have any complex sentences; they are very explicit and presuppose only basic knowledge. They use the mediopoint to structure long compounds:

Hilfe für Obdach-lose



In Hamburg hat das Winter-not-programm begonnen.

Das Winter-not-programm ist von der Stadt Hamburg.

Und das Winter-not-programm hilft Obdach-losen.

*Obdach-lose haben **keine** Wohnung.*

Obdach-lose haben nämlich wenig Geld.

*Deshalb können Obdach-lose **keine** Wohnung bezahlen.*

Und deshalb schlafen Obdach-lose oft draußen.

Auch im Winter.

Das Winter-not-programm

In Hamburg leben ungefähr 2000 Obdach-lose.

Für Obdach-lose ist der Winter gefährlich.

Im Winter ist es nämlich oft sehr kalt.

Obdach-lose schlafen bei großer Kälte draußen?

Dann können Obdach-lose zum Beispiel erfrieren.

Deshalb hat die Stadt im Winter viele Betten für Obdachlose.

Diese Betten sind in 2 großen Häusern:

- In der Friesenstraße.

Die Friesenstraße ist im Stadtteil Hammerbrook.

- Und in der Kollaustraße.

Die Kollaustraße ist im Stadtteil Lokstedt.

Ein Sprecher von der Stadt hat gesagt:

Die Obdach-losen können jetzt jeden Tag ab 17 Uhr in die 2 Häuser.

In den 2 Häusern können die Obdach-losen schlafen.

[...]

Help for homeless people

In Hamburg the winter emergency programme has begun.

The winter emergency programme is by the city of Hamburg.

And the winter emergency programme helps the homeless.

The homeless do not have homes.

The homeless have very little money.

Therefore, the homeless often do not have the money to pay for a flat.

And therefore, the homeless often sleep outside. Even in winter.

The winter emergency programme

In Hamburg, there are about 2000 homeless. For the homeless, the winter is very dangerous.

Because in winter it is often very cold.

The homeless sleep outside in the cold?

Then the homeless might for example freeze to death.

That is why the city has many beds for the homeless.

These beds are in 2 big houses:

- In Friesenstraße.

The street Friesenstraße is in the quarter Hammerbrook.

- And in Kollaustraße.

The street Kollaustraße is in the quarter Lokstedt.

A speaker of the city has said:

The homeless can go to the 2 houses every day from 5 p.m.

In the 2 houses, the homeless can sleep.

Figure 12: NDR News in Easy Language, ndr.de

The Easy Language news offer of the NDR, that also contains an audio-version of the texts, expressly addresses people with cognitive disabilities, but also learners of German.

The extensive explanations around “homeless” are due to the fact that “Obdach” as in “Obdachloser” (“homeless person”) in German does not belong to the central vocabulary: its use is restricted to legal and administrative communication; otherwise it is obsolete for “home” and in any case metonymic as it designates the roof of a building as the metonymic part to provide shelter.

As becomes visible from the text section, there are strong reductions in structural complexity on the one hand, but there are also extensive elaborations on the other hand. As a consequence, there is a relatively big amount of text conveying a relatively small amount of information on the subject (in this case: the winter emergency programme; for the strategies of reduction and addition in Easy Language see Bredel/Maaß 2016a: 533ff, Bredel/Maaß 2016b: 155ff). It has been widely proven that comprehensibility and recall are adversely affected if texts are too rich in information (for an overview, see Christmann/Groeben 2019, Fischer 2011). But at the same time, the extensive knowledge build-up pursued here (as becomes palpable in the explanation strategy that is applied) has consequences in terms of what amount of information from the source text can be conveyed in the Easy Language version (Rink 2020). This is especially the case if the often reduced attention span of the primary target groups and their ambivalent relation to written information is taken into account.

3.3.2 Characteristics of Easy Language

The core function of Easy Language is to transform information in a way that can be used autonomously by persons with communication impairments (there is another, partly conflicting function: the symbolic function, which is dealt with in Chapter 3.4 and is not addressed here). Therefore, Easy Language texts have enhanced **perceptibility** and **comprehensibility** (Bredel/Maaß 2016a: 514). The comprehensibility principle has to be put into perspective with what we know about the potential lack of **acceptability**: To prioritise comprehensibility beyond all other criteria comes at a price that might be too high; in fact, Easy Language texts may be unacceptable to the primary as well as to the secondary target groups. If they are unacceptable to the secondary target groups, they are at risk of contributing to **stigmatisation** processes. Broad acceptability and maximum comprehensibility stand in opposition to each other. This is a limiting factor for the linguistic and visual strategies of Easy Language. Four categories contribute to the following characteristics of Easy Language:

1) **Analytic, not synthetic:** To endow, wherever possible, grammatical function with a distinct lexical item (Maaß 2015), that is, it prefers analytic to synthetic forms as in the following examples:

- Negation with a separate negation marker: **not** *visible* instead of *invisible* or *unseen*; to further enhance perceptibility, the negation marker is printed in bold type.
- Tenses that separate lexical and grammatical information: *he has eaten* instead of *he ate* (German is more free to choose between the different past tenses);
- Object marking exclusively via synthetic morphemes is avoided; for German, this means to renounce the Genitive case (“possessive case”) that mostly comes without a preposition and is marked with a suffix on the noun and article itself (there is first evidence, though, that this rule does not per se lead to enhanced comprehensibility, see Lange 2019, Kugele in preparation, and Chapter 7.2).

2) **Explicitness** (Bredel/Maaß 2016a: 517ff): To be explicit, wherever possible. Standard texts usually exhibit a certain level of implicitness. Such texts do not express all their preconditions, there might be elliptic structures, relative pronouns or subordinations may be omitted or vague. It is the text users who have to complement what is missing, using their global, grammatical and discourse knowledge. It is a common feature of the Easy Language target groups that this knowledge is not to be presupposed (Rink 2020). Easy Language is, thus, explicit on all language levels: no omissions of parts of speech, few presuppositions, explication of subject matter and interrelations. The explicitness principle opposes language economy that is related to a compact presentation of content: Explicitness leads to a bigger text volume to convey the same amount of information. This is a dilemma considering that part of the Easy Language target groups struggle with reduced attention spans and many of them are slower readers. Being more explicit thus makes it necessary to select information from the source text in order to not overstrain the reader’s capacities. Another problem is that implicitness stresses the common ground between author and text users: the author suggests that he or she confides in his or her addressees to decode the meaning. Explicitness suggests the opposite, further increasing the acceptability hazard of Easy Language.

- 3) **Centrality** (Bredel/Maaß 2016a: 536): Easy Language prefers central to peripheral representatives of a linguistic category. With regard to the lexical material, this means using central, everyday vocabulary that is learnt early in life or in second language acquisition processes and is crucial for coping with daily routines instead of expert language or otherwise peripheral language, especially if tied to written language. With regard to grammatical structures: preferring such categories that are learnt early in life or in language acquisition processes and/or that are not restricted to written language. And with regard to information distribution in the text: Central information comes first while the macrostructure of source and target texts remain roughly aligned.
- 4) **Redundancy** (Rink 2020: 367f): Easy Language texts stress, point out, and repeat what is central. To this purpose, central information is highlighted by the simultaneous use of diverse layout techniques: position on the page, bold type, colour coding, visualisations, information boxes or other in order to make central information more perceptible than less important information.

Explanations of terms are repeated on each occurrence as quick knowledge acquisition cannot be expected and partial reading has to be facilitated. This rule severely hampers the economy principle on text level.
- 5) **Standard conformity** (Maaß 2015: 82ff): Easy Language avoids incorrect German. Some of the practical guidebooks heavily interfere with German orthography, grammar, and text layout conventions, provoking harsh rejection from considerable parts of the secondary target groups. I will address this problem throughout this book. Just to cite some examples: The rules for hyphenation of compounds lead to incorrect spelling (see Chapter 3.3.3 for compound segmentation) and the Easy Language layout provisions defy text and discourse conventions (see Chapter 3.4). Such problematic choices have a strong negative impact on the public image of Easy Language. To not violate orthography and grammar rules of the standard language is an important principle in order to not stigmatise users with Easy Language texts (see Chapter 6).
- 6) **Adequacy** (Maaß 2019a: 292ff): Easy Language texts use pragmatically adequate communication strategies. For example in the adequate address of adult target groups. This is not common in German Easy Language texts that often show a tendency toward asymmetry in address.

- 7) **Action-enabling potential** (Rink 2020: 310ff): Easy Language texts present the information in a way that enables the users to take action. Information is expressed via lexically rich verbs and not primarily via abstract nominal compounds in light verb constructions. Especially expert language abounds in complex, abstract and hierarchically structured nominal compounds. In these constructions, users with reduced reading skills usually find it hard to guess how they are supposed to act on the basis of the information given in a text.

Key actors are expressly named: Who is doing what to whom? One measure in this category is to avoid most of the passive voice constructions (with some exceptions, for example the victim passive in news texts where it is not possible to name the perpetrator as he or she is yet unknown). This often requires translators to do some research and to investigate who is acting in a given situation.

Information is, whenever possible, structured in chronological order. If a text instructs on how to perform an action, information should be given in chronological order and not like in the following example taken from a user manual:

“If you plan to leave the unit unused for an extended period, disconnect the power cord from the wall socket **after turning off the power switch** [...]” (www.miele.co.uk/c/kitchen-56.htm, my highlighting)

It might be unsafe to follow the instruction in the order in which the information is given; grammatical knowledge and a firm grasp of the content are needed to disconnect the action steps from the order of information.

- 8) **Bridging** (Bredel/Maaß 2016a: 57f): Easy Language texts maintain, if possible, a connection between source text (standard or expert language) and target text (Easy Language) so users can switch between the different versions. People in need of Easy Language should be able to access the source texts if they wish. This is made possible if the Easy Language target text adheres at least partly to the macrostructure of the original text. People are thus enabled to check what was in the original or to try and read the original and switch to the Easy Language version wherever necessary. This is an ethical premise insofar as it paves the way for those readers that are able to leave the Easy Language universe after they have acquired sufficient skills and knowledge for some text types.

These general characteristics are not always implemented in Easy Language texts but have proven essential for a successful text practice (see Rink 2020). In the following, I will describe features of Easy Language on word, syntactic and text levels mainly based on Bredel/Maaß (2016a, b).

3.3.3 Word level

The idea that texts can be influenced on the word level toward more comprehensibility is founded on two basic assumptions:

- The same concept can be expressed with different words of the same language, that is, using (partial) synonyms.
- Conceptual areas, scripts and frames are covered by lexical fields. The relations between the lexical items in this field can be used to express, explain or circumscribe a concept that is too abstract, too peripheral and/or too specific to belong to the regular lexical inventory of Easy Language. Easy Language prefers more concrete hyponyms or more central hypernyms, paraphrase and exemplification instead.

It is not straightforward to specify the exact lexical inventory of Easy Language. It has not proven feasible to rely on word frequency lists to establish a basic Easy Language vocabulary, as Beckers (2014) shows in her work on fairy-tales in Easy Language. The aim of her study was to verify whether word frequency lists are helpful for Easy Language translation: If this were the case, one would simply have to add paraphrases or explanations to all those lexical items that are not contained in the top 3000 of different frequency lists. Beckers (2014) shows that this concept does not work: The 100 most frequent words make up almost 50% of all words in texts and the most frequent 2500 words make up 75% of all words in German texts (Duden 2020); it is to be supposed that the situation does not substantially differ for other languages.

As Easy Language prefers central to peripheral vocabulary, the type-token-ratio of those texts tends to be smaller (a comparison of the type-token-ratio for Easy Language, Plain Language and the standard language original for a small text sample is part of Gutermuth's 2020 study). But even in Easy Language, not all words that do not figure among the 3000 most frequent need to be introduced or paraphrased in Easy Language: Depending on the text type, Easy Language users tend to know and understand a certain amount of words that are partially predictable even if they are not among the generally most frequent words. Users master certain text types that are not so frequent on a

general basis. If users are familiar with these text types and discourses, they will usually understand their central vocabulary. This is for example the case with fairy-tales: The word *princess* does not make it on to any most-frequent list but is usually understood by a wide range of Easy Language users including the primary target group with cognitive disabilities. Users that do not know the word *princess* will be confronted with a cultural barrier rather than with (or in addition to) a language or cognitive barrier (see Chapter 1.2). It is not an adequate strategy to paraphrase or explain *princess* in a regular Easy Language fairy-tale. The same is true for terms belonging to the word field *disability* when addressing people with disabilities (Keller 2020a). Users with disabilities usually have firm concepts and good terminological knowledge in this field, even if terms like *inclusion* or *Convention on the rights of persons with disabilities* neither correspond to Easy Language rules and are not situated in the top 3000 of the word frequency lists. Thus, frequency lists are not an apt tool for mechanical implementation in Easy Language.

Rather than establishing the basic vocabulary via frequency list, it is helpful to figure out what the central items of word fields are. Vocabulary that is suitable for Easy Language has the following features (Bredel/Maaß 2016b: 74); such words:

- ... occur more frequently than their neighbours in the same word field
- ... are morphologically less complex
- ... are able to replace their neighbours in the same word field without distorting the meaning
- ... occur in oral and written language
- ... are stylistically neutral
- ... denominate only and precisely their concept
- ... (almost) do not have connotations or secondary meanings
- ... are not metaphors (with the previously described restrictions)
- ... belong to the basic vocabulary of German
- ... are learnt early in the process of primary or secondary language acquisition
- ... are unlearnt late in case of language degradation processes (like dementia)

Most words will not correspond to all but only to several or even most of these criteria. The list gives an indication as to what characteristics enhance comprehensibility. In some cases, the lexical element in Easy Language may distort

the original meaning more or less slightly. This is often the case for terminology, for example in legal or administrative communication, if it is rendered with everyday vocabulary. This kind of distortion might not always be salvaged: introducing and explaining too many terms will destroy the text. This results in Easy Language texts usually not being legally enforceable (Bredel/Maaß 2016b: 26).

Foreign words in Easy Language

One of the few concordant rules between all three practical German rule sets is that foreign words have to be avoided or, if they are necessary, explained (Bredel/Maaß 2016a: 347f). However, the problem is generally not the origin of a word, but whether users are familiar with it. If they are not, it can be a question of content or form: Foreign words may seem unfamiliar in their spelling and pose a problem in terms of their pronunciation. This is, for example, the case with foreign words in German that derive from English (*computer, service, download*). Users might even know them in oral communication but might not recognise them in the written form or might not know how to pronounce them. However, even in such cases, it is not an option to indicate the pronunciation of common words like *computer* in an intuitive phonetic transcription (“*Computer is pronounced ‘Kompjuta’*”). This strategy comes at too high a price: It provokes harsh rejection from a part of the general public and leads to sharply reduced acceptability of the respective texts. In order to give indications on the pronunciation of a word, medial strategies have to be chosen (audiotrack) (Bredel/Maaß 2016b: 80).

As a consequence, a general ban on foreign words is neither useful nor practical; many of the words have belonged to the language system for a long time and might even be the central representative in the word field. If they are not, the rule to use the central representative of the respective word field or else to explain the peripheral word applies anyway. Foreign words are often terms belonging to an expert subject; in such cases, the reason to avoid them lies rather in this quality than in them being foreign words. The next section is dedicated to dealing with terminology in Easy Language texts.

Terminology in Easy Language

As Easy Language is often used in expert-lay communication, especially in medical, legal or administrative communication, it has to cope with terminology used in the source texts. It is often neither possible nor desirable to avoid terminology as users will need it to act appropriately in the target situation

where the terms are being used. However, terms related to expert language will often have to be explained.

Terminology comes in two types (Bredel/Maaß 2016a: 81ff):

- Terminology that is domain-specific and recognisable as such: *appendicitis*, *photosynthesis*, *subpoena*. Users unacquainted with those terms will not understand them but will realise that. They might be put-off or unsettled, but they know that they have a comprehensibility issue.
- Terminology deriving from everyday language that is used within a domain in a specific meaning: *body* in physics, *resistance* in electrical engineering, *hearing* in legal studies. Users might know those words from other contexts and not realise that their meaning in the expert domain considerably differs from the one they know. They might misinterpret their meaning and wrongly assume that they adequately understood.

Both kinds of terminology have to be introduced and explained in the Easy Language text. The direction for new concepts is to first present the term and then the explanation (Rink 2020: 355f):

During the operation, you get a general anaesthesia.

Anaesthesia means:

You will be sleeping during the operation.

You will **not** feel pain.

In German Easy Language, the paragraph containing the explanations will often have an indent (Bredel/Maaß 2016b: 83, 161f). The hypothesis is that this way, when looking over the page, experienced Easy Language users see that an explanation is given. They are alerted to the fact that they can expect a term and are not discouraged when it appears. The end of the explanation is again marked visually by an unindent. It is the signal that the explanation is finished and the text subject resumes. It is known that weak readers find it hard to grasp the macrostructure of a text. Working with indents (alongside other instruments like subheadings etc.) may help them to structure the text and reach the macro-level.

Glossaries are only helpful to those readers that seldom use them (Bredel/Maaß 2016b: 169f): If the explanations of terms in the glossary are

needed to comprehend the text they will not be of any use to weak readers. In order to consult the glossary, they have to interrupt their reading of the text and resume afterwards. This will hamper their comprehension on the macro level. Glossaries are often in alphabetical order which makes them even more unpractical to the primary target groups as the precondition to using them is a firm knowledge of the alphabetical order (for more a detailed consideration of glossaries, see below, Chapter 3.3.5).

Proper names

The practical guidelines do not mention proper names. However, proper names offer opportunities and challenges to Easy Language translation. Proper names (*Finland, Venus, Vera*) are semantically empty. They don't classify objects or facts but identify individual persons or entities (Bredel/Maaß 2016a: 355). They are not identified by listing their characteristics but rather by labeling them. Persons, places or objects named in a text will have certain functions with respect to the subject matter that may be indicated in the text:

- *Mr Marsh* might be the responsible case worker.
- *Dante Alighieri* was a prominent Italian poet.
- The *Taj Mahal* is a famous palace in India.
- *Hanover* is a town in Northern Germany.

Proper names can be used in another way that is particularly favourable for comprehension: In certain domains like legal or administrative communication, proper names can be used to identify individuals with their roles in administrative or legal procedures that are otherwise hard to express in a comprehensible way (Bredel/Maaß 2016a: 359, 2016b: 132). This can be helpful as these roles are abstract and partially overlapping: a person is, in legal terms, at the same time

- a husband to his wife
- son to his father
- father to his son (whose grandfather is the father of our reference person)
- grandfather to his son's son (which makes his son a father and perhaps a husband as well)

The roles of “son”, “father”, “grandfather” keep recurring at the different age levels and are interrelated. This makes it rather complicated to express, for example, inheritance relations in legal texts. Texts become much easier to comprehend if these roles are made identifiable with the help of proper names (example taken from Bredel/Maaß 2016b: 88, my translation):

Source text:

A husband leaves behind his wife and four children. His parents and his brother are still alive.

Target text:

Otto is married to Helga.

Otto and Helga have 4 children.

The parents of Otto are still alive.

Otto has a brother: Heinz.

Otto dies.

This strategy has major advantages for Easy Language in various instances: It makes abstract roles palpable and helps to stabilise those roles through the course of a text. Proper names help readers allocate roles and actions across sentences and keep attention focussed.

Gender sensitive language

Gender sensitive language is an important discourse topic in Germany (an overview and suggestions for practical use in Diewald/Steinhauer 2017). German morphology provides feminine forms for many designations of jobs, social roles or discourse participation:

- *Arzt* – *Ärztin* (“doctor” m/f)
- *Präsident* – *Präsidentin* (“president” m/f)
- *Leser* – *Leserin* (“reader” m/f)
- *Lehrer* – *Lehrerin* (“teacher” m/f)
- *Bäckereifachverkäufer* – *Bäckereifachverkäuferin* (“bakery sales assistant”)
- *Kraftfahrzeugmechatroniker* – *Kraftfahrzeugmechatronikerin* (“automotive mechatronics technician” m/f)

There is an increase of expressly neutral forms, for example, on *-end* (Bülow/Harnisch 2015), but they do not usually belong to the close-range vocabu-

lary of everyday language, but are rather formal in style (for example, *Dozierende* for “male and female professors”). In official contexts like job offers or official letters it is a legal imperative to use the masculine and feminine forms. There are different forms of abbreviations of those binary forms in written texts and there has been a decade-long heated discussion as to which one to prefer:

- *Leser(in); Kraftfahrzeugmechatroniker(in)* (= “male/female reader”; “male/female automotive mechatronics technician”)
- *Leser*in; Kraftfahrzeugmechatroniker*in*
- *Leser_in; Kraftfahrzeugmechatroniker_in*
- *LeserIn; KraftfahrzeugmechatronikerIn*
- *Leser/in; Kraftfahrzeugmechatroniker/in*

Neither of these forms have an oral equivalent; they will simply be dissolved into the masculine plus the feminine (or feminine plus masculine) form: “Liebe Leser*innen” (“Dear readers*”) will thus have to be pronounced “Liebe Leserinnen und Leser” (“Dear female and male readers”).

The abbreviated forms are restricted to written communication. To know that the uppercase “I” in *LeserIn; KraftfahrzeugmechatronikerIn* means that the word expresses the masculine as well as the feminine form requires language and discourse knowledge as well as experience with texts that usually work with such abbreviations (official letters, written speeches, job descriptions, legal and administrative communication of any kind). In Easy Language, those condensed forms would have to be dissolved into their pronounceable counterparts. In a job description, one would have to write (Bredel/Maaß 2016b: 89; my translation):

<p>Wer Kraftfahrzeugmechatroniker oder Kraftfahrzeugmechatronikerin werden möchte, muss ...</p>	<p>Persons who want to become a male automotive mechatronics technician or a female automotive mechatronics technician will have to...</p>
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It is obvious that the quest for comprehensibility and the quest for gender sensitivity are sometimes difficult to resolve in one bout. As Easy Language chooses comprehensibility above other criteria, gender sensitivity takes a back seat if comprehensibility is at stake. In many cases, it is possible to use both the

masculine and the feminine form. This is, for example, the case when the role denomination stands out, as in address:

<p>Liebe Leserin, lieber Leser, dieser Text ist für Sie vielleicht sehr leicht. Dieser Text ist nämlich in Leichter Sprache geschrieben.</p> <p>(Bredel/Maaß 2016b: 90)</p>	<p>Dear female reader, dear male reader, This text is perhaps very easy for you. This is because this text is in Easy Language.</p> <p>(my translation)</p>
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If only females or an individual female person are designated, only the female form is used:

Bundeskanzlerin Merkel = “female Federal Chancellor Merkel”

Easy Language texts especially from the context of politics or administration work with disclaimers that explain why only masculine forms are used; the following example is a real-life example and taken from Bredel/Maaß (2016b: 90f):

<p>Wichtig! In den Texten stehen immer nur die Wörter für Männer. Zum Beispiel: Im Text steht nur Notar. Dann kann man den Text leichter lesen. Aber auch Frauen sind gemeint. Zum Beispiel: Das Wort Notar steht im Text. Der Notar kann ein Mann sein. Aber ein Notar kann auch eine Frau sein. Die Frau heißt dann: Notarin.</p> <p>(Bredel/Maaß 2016b: 90f)</p>	<p>Important! In the texts only the words for men are used. For example: The text says only notary. This makes the text easier to read. But this also applies to women. For example: The word notary is in the text. The notary can be a man. But a notary can also be a woman. The woman is a female notary.</p> <p>(my translation)</p>
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We witness a clash of interest here: getting to the point where gender sensitive language is used on a regular basis has been a long and thorny road for the feminist empowerment movement and political activists. It is not easily to tolerate these achievements being practically rolled back in the name of inclusion for people with disabilities. To embody the contradiction between plurali-

ty of address and comprehensibility is one of the burdens of Easy Language that deduces from its acceptability and remains an unresolvable dilemma.

Same concept – same designation

To renounce lexical variation, that is, to always designate a concept with the same word, is one of the basic rules all practical guidelines agree on (Maaß 2015: 34, Bredel/Maaß 2016b: 91f). In standard text practice, lexical variation is associated with well-written texts and recommended by style books. But it is not only a matter of aesthetics in style; lexical variation is linked to economic writing. By means of lexical variation, information is introduced into a text:

Smith was appointed a public defender, but **the 45-year-old** opted instead to represent himself during trial, prosecutors said. (www.oxygen.com, January 15th 2020; name of the suspect disguised)

The example shows that this strategy imposes high demands on attention focus and requires global, discourse and language knowledge. In the present case, there are even two possible anchors for “the 45-year-old” and readers will need to finish the clause in order to dissolve the ambiguity. Easy Language excludes this kind of variation. Several of the Easy Language target groups are known to have a reduced attention span, some have reduced linguistic or cultural knowledge with regard to the language in question. Thus, in Easy Language, linguistic variation is banned and discourse topics are resumed with identical nominal anaphora. In the present case, the name “Smith” would have to be repeated over and over again in order to ensure that readers do not get lost when navigating the text. This has two possible consequences. The information on the suspect’s age can be...

- 1) ... left out. This leads to a reduced amount of information in the target text.
- 2) ... introduced in a separate sentence. This adds to the volume of the target text, making it more difficult to process as a whole.

On a text level, the rule to use the same designation without variation extends to a ban on 3rd person anaphoric pronouns. They require grammatical and lexical as well as global and discourse knowledge (Schroeder 2006, for an application to Easy Language, see Bredel/Maaß 2016a: 371). Some Easy Language users do not have the knowledge necessary to reliably resolve pronominal

anaphora. Studies on linguistic decay with dementia-type illnesses have proven that patients tend to have problems following when anaphoric pronouns are used (Schecker 2003: 289). The following example illustrates the type of problem 3rd person anaphoric pronouns represent for the users:

Mary has offered Fiona a cruise on the AIDAdiva for her birthday. She ...
... has not always been so generous. (= Mary)
... simply couldn't believe her luck. (= Fiona)
... sails under Italian flag. (= the ship)

Thus, Easy Language renounces 3rd person anaphoric pronouns. This has consequences for the aesthetics, the linguistic economy as well as the coherence of Easy Language texts and, again, is a hazard to acceptability.

In Maaß (2015: 109f) and Bredel/Maaß (2016b: 113) we propose extending the notion of “same concept – same designation” to other parts of speech like subjunctions or connectors. We define standard subjunctions or connectors for the different types of semantic relations. So everytime certain semantic relations in clauses recur, they will be expressed with the same subjunctions or connector in order to reduce cognitive effort.

Compound segmentation

Compound words in German can accumulate to a considerable length, as is shown in this picture that I took on a summer vacation on the North Sea coast. The word “Tageskurbeitragsautomat” means “one-day spa tax (ticket) vending machine”:



Figure 13: “one-day spa tax (ticket) vending machine”, personal picture archive

Comprehensibility research has proven that words are harder to process the more syllables they have; long words are fixated considerably longer than shorter ones (Just/Carpenter 1980: 337). The most significant factor for processing is novelty: new words took an extra 802 milliseconds on average to

process (Just/Carpenter 1980: 339); that is, to process a new word takes on average more than 10 times longer than an extra syllable. The present example has both properties: For most readers, it is a new word, and it has eight syllables. Just/Carpenter (1980, 1992) carried out their research with experienced readers; a desideratum that is being fulfilled at the moment is to reproduce these studies with the primary target groups of Easy Language (for first results, see Gutermuth 2020, Deilen 2020). Baddeley et al. showed as early as 1975 that comprehension and recall are associated with the number of words being read and connected in a time span of two seconds. So it is intuitive that the German Easy Language rules propose segmentation of the compounds with hyphens to make the single words easier to perceive and thus possibly lay the basis for a successful processing of the single components. The practical guidelines propose using the hyphen and generalising its use to the segmentation of all kinds of compound nouns (BITV 2.0 2011: “Compound nouns have to be segmented with hyphens.”). In a practical application, this leads to segmentations like the following, all of them defying German orthography:

- **Post-Leit-Zahl* instead of *Postleitzahl* (“postal code”)
- **Kranken-Haus* instead of *Krankenhaus* („hospital”)
- The segmentation even extends to verbs and and derivations:
- **mit-kommen* instead of *mitkommen* (“to come along”)
- **Krank-Heit* instead of *Krankheit* (“illness”)

The compound noun “one-day spa tax (ticket) vending machine” would be segmented like this:

Tages-Kur-Beitrags-Automat

The hyphenation rule is one of the few regulations that recur in all practical German guidelines on the assumption that it is helpful to indicate the borders of the single lexical items of the compound as a first step in order to facilitate semantic reintegration: The word “Tageskurbeitrags*automat*” is not intended to contain *Sau* (“sow”, female pig) or *Tomat* (“tomato”). Readers that read *sow* and *tomato* here might find it difficult to reintegrate the word and establish a coherent meaning fitting the situation as a basis for their related actions (here: to buy a ticket before entering the beach area in order to contribute to beach maintenance and in order not to be fined later on). The hyphens are inserted to show where to segment the word and what to reintegrate in the next step. As

in regular German hyphenated compounds (“Ost-West-Konflikt” “East-West conflict”), the letter following the hyphen is an upper case. This rule is, however, extended to cases that are not covered by standard German grammar.

At first glance it is plausible to assume that the hyphens are helpful for comprehension, but there are some severe problems associated with this solution. I will go into detail in Chapter 3.4. To summarise in short (see also Maaß 2015: 88, Bredel/Maaß 2016a: 336ff):

- The hyphens create incorrect spelling. This leads to reduced acceptability of Easy Language and carries the risk of keeping users from leaving the Easy Language text universe.
- The words might not be recognisable language for the target group (they might not find the “Tageskurbeitragsautomat” on the beach if their Easy Language leaflet spells it “Tages-Kur-Beitrags-Automat”). The discrepancy between the Easy Language text world and the regular, non-comprehensibility-enhanced environment increases the cognitive effort necessary to act on the basis of a text. The long compounds do not usually belong to the Easy Language vocabulary, but mostly derive from expert or otherwise specialised contexts. Therefore, they are usually explained in the Easy Language context. In the context of the example, “one-day spa tax (ticket) vending machine” one would expect a leaflet that explains “spa tax” and what this tax is used for, the actions to be carried out in order to get a ticket, as well as the consequences of being caught without one. This means, the Easy Language text would place emphasis on the word anyway. But if the word on the leaflet looks considerably different from the word on the sign posted on the beach, the cognitive effort required to match the two versions of the word will supposedly increase.
- Research (Hansen-Schirra/Gutermuth 2018, Gutermuth 2020, Wellmann 2020, Deilen 2020) indicates that semantic reintegration might not be as smooth as presumed and that the hyphen may prove to be detrimental for comprehension. “One-day spa tax (ticket) vending machine” is not only hard to decipher, but also conveys quite a complex concept. Even if users are able to see the single words they will have to integrate them into a meaningful whole, which is not trivial.

As a response to this situation, in Maaß (2015) and Bredel/Maaß (2016a, b, 2017), we proposed the “mediopoint” (“Mediopunkt”) to segment compounds

where the use of the hyphen would be incorrect. The mediopoint is not part of the German orthographical system and thus more neutral, as it does not generate misspellings in the strict sense. Just like the hyphen, it indicates the borders between the single lexical items in the compound noun.

Vorlese-stift für den Heidelberger Zoo



Text vor-lesen 

Anne Sack ist Studentin.

Sie **arbeitet** in der **Zoo-schule** in Heidelberg.

Anne Sack ist **Zoo-rangerin**.

Anne Sack hatte eine **Idee**:

Alle Menschen sollen im Zoo etwas **lernen**.

Auch Menschen, die **nicht** lesen können.

[Weiterlesen >](#)

Figure 14: Mediopoint on an German Easy Language website (www.einfach-heidelberg.de, news text August 19th 2019)

The example in English:

Read aloud pen for the Heidelberg Zoo

Anne Sack is a student.

She works in the zoo school in Heidelberg.

Anne Sack is a zoo ranger.

Anne Sack had an idea:

All people should be able to learn in the zoo.

Even people that cannot read. [...]

Read more >

The assumption is that the mediopoint used for hyphenation enhances the perceptibility of the single words in the compound, which, in the next step, leads to enhanced comprehensibility without the harmful results of the hyphen that exhibits low performance in terms of comprehensibility and additionally shows sharply reduced acceptability. The mediopoint is now widespread in Easy Language texts in Germany. But the assumption that it helps to process long words is based on a hypothesis: we actually do not know for certain whether it is helpful at all; even though Wellmann (2020) shows that the mediopoint yields better results than the hyphen, research (Deilen 2020) indicates that the segmentation of words might well be beneficial for comprehension to

some extent, but with some reservations. Gutermuth (2020) shows that some of the target groups are put-off when confronted with the mediopoint, even if they profit in terms of comprehension and recall, and Hansen-Schirra/Maaß (2020a) hypothesise that deviations from the standard always come along with cognitive processing costs.

Of course, there are very long words with ambiguous segmentation options like *Tageskurbeitragsautomat* where a visual segmentation is most probably helpful, but Gutermuth's (2020) findings point in the direction that in relatively short words (like *Vorlesestift* in my example) the negative impact of departing from the standard might outweigh the possible advantages; more research is underway.

Some of the rules on the word level are language specific; what will apply across languages is the centrality rule with regard to the vocabulary that con-cords with the general principles laid down in 3.3.2. It also extends to syntactic markers, as the next chapter will show.

3.3.4 Syntactic level

The syntactic rules are the most language specific among the Easy Language rules as they rely on the syntactic properties of the connecting elements. The perspective of the following paragraphs is, therefore, related to German. It might nonetheless prove helpful to look into the solutions for German as they prove to be at least partially transferrable or comparable to other languages.

Independent clauses only

The practical guidelines concur in postulating that sentences have to be kept short and that only one proposition is allowed per sentence. This is not meant in the strictly linguistic sense; in Maaß (2015) and Bredel/Maaß (2016a, b) we suggest that on the basis of these practical rules and the findings of comprehensibility research, Easy Language will have to stick to an independent clause-only structure and, at the same time, avoid complex nominal phrases (see below) while retaining standardised connectives (see Sanders et al. 2007 for the role of connectives to help poor readers to integrate sentences). The link between sentence length and comprehension has been a key criterion the beginning of comprehensibility research to the classical readability formula (for example, the Flesch Reading Ease as proposed in Flesch 1948).

The independent clause-only principle leads to a rather simple information structure for Easy Language texts. When complex nominal structures have to be resolved, translators often encounter the problem that the source structure

does not disclose who is performing an action (Bredel/Maaß 2016b: 130ff). This information will have to be procured and added to the text if it is meant to enable the users to act. These are the main qualities of Easy Language on the sentence level (Bredel/Maaß 2016b: 102):

To remove comprehension barriers on sentence level means creating

- **independent clauses** (and not compound clauses or coordinations),
- that use **verbal style** (and not nominal style), and
- that express the propositions **directly** (and not indirectly),
- that are **action enabling** (and not event oriented)
- and point from the **here and now** (and not in far away times or spaces)
- to the **real world** (and not to possible or past worlds) (Bredel/Maaß 2016b: 102).

The first two criteria will lead to a grammatically simple structure; the last four to semantic transparency and enhance the action-enabling potential of the texts or, in a wider sense, communicative products.

Transforming adverbial clauses

Adverbial clauses are introduced by a subjunction containing information with regard to the semantics of the sub-clause. Some subjunctions are bound to compound clauses, others may also be used in independent clauses. In Maaß (2015) and Bredel/Maaß (2016a, b), we propose replacing such subjunctions that cannot be used in independent clauses using the same subjunction for the same type of adverbial clause:

- *obwohl* (“although”) is a subjunction used to introduce a concession in a sub-clause.
- *trotzdem* (“nevertheless”) also introduces a concession, but it may be used in independent clauses.

We thus suggest using *trotzdem* (“nevertheless”) instead of *obwohl* (“although”) everytime a concession has to be introduced in an Easy Language text. We defined standard substitutions for the main types of German adverbial clauses, thereby considerably reducing the amount of different subjunctions used in Easy Language texts (Maaß 2015: 109ff, 181; Bredel/Maaß 2016b: 103ff). We chose the substitutes on the basis of the criteria given in 3.3.3 (centrality, high frequency of use, reduced morphological complexity, broad applicability, sty-

listic neutrality, precision etc.). The transfer to English is, at this point, only tentative and would require thorough empirical studies as the concrete subjunctions of the original model are bound to the German language.

To define standard replacements for subjunctions has at least two advantages:

- The users profit because the grammatical markers chosen will not overburden their comprehension resources. They will be repeated so that knowledge can be built up according to their use. Ambiguity is reduced.
- The text producers profit because they have a standard procedure at hand that is approved and tested; they need security for their work as translators. In the concrete case, there is another advantage: Trained translators will be quick to use those strategies. They can be practiced and internalised, which makes them applicable for other contexts like Easy Language interpreting.

Of course, these strategies depend on the single language that they were designed for. Przybyła-Wilkin (2016) shows in the example of Polish that they are principally transferable to other languages.

In the following, I give examples for German adverbial clauses and their default Easy Language solutions:

Condition: *wenn ... dann* (“if... then”), transformed into question + “then”: *Wenn Du müde bist, dann geh ins Bett.* → *Du bist müde? Dann geh ins Bett.* (“If you are tired, go to bed” → “You are tired? Then go to bed.”)

Cause: *Weil* (“Because... , ...”); in the case of first naming the cause and then the effect: *deshalb* (“Therefore”). In the case of first naming the effect and then cause: *nämlich* (“in fact”): *Weil ich müde war, ging ich ins Bett.* (“Because I was tired, I went to bed.”) → *Ich war müde. Deshalb bin ich ins Bett gegangen.* (“I was tired. Therefore, I went to bed.”) → *Ich bin ins Bett gegangen. Ich war nämlich müde.* (“I went to bed. In fact, I was tired.”)

Purpose: *Damit* (“so that...”, “lest...”); the purpose can be rendered by indicating the intention and adding the cause: *wollen* + *deshalb* (“want

to” + “therefore”): *Ich habe leise gesprochen, damit ich nicht das Baby wecke.* (“I spoke in a low voice lest I should wake up the baby.”) → *Ich wollte nicht das Baby wecken. Deshalb habe ich leise gesprochen.* (“I did not want to wake up the baby. Therefore, I spoke in a low voice.”)

Other strategies to transform complex into simple sentences are not available: In standard language, compound sentences can be transferred into a complex phrase structure. But complex nominal phrases are not allowed in Easy Language. In fact, they are difficult to process (Hansen-Schirra/Gutermuth 2018).

Transforming Relative Clauses

Relative clauses give information on their antecedent and are grammatically dependent on it. This means, grammatical knowledge is needed in order to resolve the relative pronoun-antecedent relationship. Relative clauses pose considerable difficulties for the Easy Language target groups. They require grammatical knowledge, reading experience and an extended attention focus. Bock (2019: 46) shows that especially inflected forms (for English: *whom*, *whose*) are difficult to dissolve: in her empirical study with test persons with cognitive disabilities, those clause types lead to error rates of 75.9%. Embedded relative clauses also pose problems (Christmann/Groeben 2019: 130). In English, relative clauses can even occur without relative pronouns; there is so far no research in this respect but it might be presumed that they could also be difficult to process for the primary target groups of Easy Language as they contradict the principle of explicitness (see above, Chapter 3.3.2).

In Easy Language, relative clauses are to be avoided and the content transferred to several independent clauses. This is usually easier for non-restrictive relative clauses; they provide additional information that can be transferred to a separate sentence or left out (see below strategies on text level). Restrictive relative clauses modify the meaning of the antecedent or restrict the range of referents. They cannot easily be omitted. Usually, the information from the relative clause will have to come first:

A car that costs 20,000 euros is not affordable for many people.

Easy Language:

Some cars cost more than 20,000 euros.

Many people cannot afford to buy such cars. /

Those cars are too expensive for many people.

For more details on relative clauses in German Easy Language see Bredel/Maaß (2016a: 387ff and 2016b: 113ff).

Transforming noun clauses

Noun clauses are part of complex sentences: the subject or object of a main clause is also a clause. It remains to be empirically tested whether such clauses are more difficult to process than complex nouns or prepositional phrases. In Bredel/Maaß (2016a: 398ff, 2016b: 116ff) we hypothesise that they have to be separated in Easy Language as they consist of more than one clause and in any case of several propositions. It has to be checked for other languages, for example for English, if this can be turned into a general rule. There are cases, especially with respect to the interrogative clauses, where this is probable (example taken from Jespersen's classical 1933 grammar):

There is some doubt as to whether the document is genuine.

Easy Language:

Is the document genuine?

There is some doubt about that.

The regular translation strategy for interrogative noun clauses is to dissolve them into the underlying question and formulate the restriction in the answer to the question. In the case of content clauses, the information from the main sentence can be placed in the first position. The main sentence concludes with a colon that points to the information contained in the noun clause (example again taken from Jespersen 1933):

I believe that he is dead.

Easy Language:

I believe this:

He is dead.

This example shows, however, that it might not always be a useful strategy. The Easy Language sentence is not idiomatic; it would be better to say:

This is what I believe:

He is dead.

But this version does not eliminate the noun clause, it only substitutes it with another. It is the question whether “I believe he is dead” deviates from Easy Language at all and whether the result is the same across languages. Answers will be provided through empirical research.

Coordination of words, phrases, or clauses of the same type

Coordination means to join words, phrases, or clauses of the same syntactic type and to aggregate them in a common semantic category. To allow only one proposition per sentence would also exclude all forms of coordination, also of the type *Peter and Paul are going to the cinema*. It is certainly not beneficial for comprehension to dissolve this sentence into its proposition:

Peter is going to the cinema.
And Paul is going to the cinema.

But if the coordinated items exceed two items or are more complex, they have to be revised and dissolved into separate clauses. A strategy that works well for all types of *and*-coordinations are lists; the common category is named and then the items are listed with bullet points (Bredel/Maaß 2016b: 162):

Have you ever considered what will become of your assets after your death? Who gets the house, who the household goods, who the car, the bank savings?

Easy Language:

Who gets my belongings after my death?

- Who gets my house?
- Who gets the contents of my house?
- Who gets my car?
- Who gets my money?

It is important to name the common category of the coordinated items in order to have the right introduction that prepares the readers for what follows (Bredel/Maaß 2016a: 402f; 2016b: 122). This way, the respective word field is activated and readers might have expectations as to what will follow. This allows them to leave the level of single propositions and link the single parts of textual information to bigger chunks – an important prerequisite to understanding on the text level.

Transforming complex nominal structures

Complex nominal structures are not part of the Easy Language variety but are present in the source texts and have to be dealt with by translators: Complex nominal structures have to be resolved in Easy Language. They are very typical for expert texts like legal, administrative or technical texts and are not adequate for the comprehension resource of the Easy Language target groups (Rink 2020). The main information is placed on the nominal elements, while verbs remain light and carry no or almost no information.

to execute measurements > to measure

Complex nominal structures are highly functional in expert-expert communication (Maaß 2015: 102). The nouns are often terms with a concise meaning and definition and cannot be simply replaced by their verbs. In this case, a measurement in a certain discipline may imply a defined standard procedure while upholding clearly outlined quality criteria. *To measure* will very probably not mean the same. Nonetheless, complex nominal structures will usually have to be dissolved in Easy Language, as they tend to overstrain the comprehension resource of the target groups. And often, complex nominal structures are used in expert texts to an extent and in a manner that is not justifiable through functional constraints (Rink 2020: 111ff). In Easy Language translation, complex nominal constructions are to be resolved into independent clauses. On the one hand, this makes them less precise as the terms used in the source text are omitted or explained / exemplified. A term belonging to an expert domain usually cannot be explained or exemplified as precisely as its meaning within the expert discourse. By renouncing terms, transferring content from the nouns to the verbs, and by explaining and exemplifying them with very simple and basic linguistic means, texts do not only become more comprehensible, but at the same time less exact and less accurate. This leads, for example, to Easy Language legal texts not being legally enforceable. On the other hand, texts will become much more concrete if complex nominal structures are converted into simple independent clauses with concrete and semantically rich verbs. Often, information has to be added (for example, with regard to concrete contact persons); that enhances the texts' action-enabling potential.

Three stages of syntactic complexity

It is not a straightforward task for translators to move from a complex nominal structure directly to a set of corresponding independent clauses. According to

our teaching experience, new translators often find it easier to take a step across a complex sentence that is then resolved according to the transformation rules for compound sentences presented earlier. There are thus three different stages of syntactic complexity (Maaß 2015: 118):

- 1) **Nominal stage:** The source text contains a complex nominal structure.

Example (Maaß 2015: 118f):

The handling of your hearing aids has been comprehensively explained to you.

- 2) **Syntactic stage:** The nominal structure is transformed into a compound sentence.

*We have already explained to you **how** your hearing aids work / **how** to use your hearing aids.*

- 3) **Text stage:** The compound sentence is dissolved into individual independent clauses.

We have already explained to you:

This is how your hearing aids work.

This is how you must use your hearing aids.

The advantage of this approach is that the relations between the different parts of the nominal structure become evident and ambiguities are revealed. At the syntactic stage, the translator at times has to interpret which version is the correct one or find further information. In the present case, “handling” implies either technical maintenance (cleaning, batteries, defects) or use in everyday situations (How to handle the hearing aids when it is raining? When taking a shower? In a loud environment?). The perspective can be to protect the device from damage or to protect the customer’s ears; all these aspects are implied by “handling”. They will have to be explicated in Easy Language. In the translation process, the complex nominal structure was transferred into an interrogative noun clause that was then further processed into a range of independent sentences. The semantic relation between the single propositions is no longer on the level of one sentence, but transcends the sentence level in the direction of a text segment (thus: text stage).

The phased procedure helps translators to dissolve complex nominal structures and to single out the right interpretation.

Counterfactual presentations of events

Easy Language is a language of proximity (Bredel/Maaß 2016a: 516f, 2016b: 137). This also means that all utterances should be relatable to concrete, palpable facts and situations. Easy Language thus avoids indirect reference as, for example, in hypothetical or counterfactual conditionals.

Counterfactual constructions are very complex conceptualisations of the world and are very demanding in Easy Language translation: They draft a world that does not factually exist, and explicitly decline the existence of this world or of aspects of this world. Counterfactual constructions and negation are structurally similar: they verbalise an expectation the addressee is assumed to have, and delete this expectation explicitly (Bredel/Maaß 2016a: 457; example taken from Bredel/Maaß 2016b: 140):

If Charles had passed his A level he would have got an apprenticeship.

If such a sentence is uttered, the addressee knows that Charles has in fact NOT passed his A level, even if this is not expressly mentioned here. What really happened – Charles failed his exam – remains implicit and is indirectly expressed. What is verbalised is the consequence that his passing the A level would have had. This consequence will not ensue, as it was bound to the condition that was not realised. Such sentences are cognitively demanding. The difficulty is not first and foremost in the grammatical structures, but in the complex relation between what is and what is not real and the way it is expressed. Counterfactuals and hypotheticals are very frequent in legal communication. They are closely linked to negativity: They are, in fact, outlines of two scenarios, one being factual and one being counterfactual. Both have consequences. Counterfactual conditionals spell out the scenario that is NOT taking place (Scenario 2). It is possible to avoid the counterfactual and instead relate what is really the case (Scenario 1). But this factual scenario is a negative one, that is, negativity cannot be ruled out in counterfactual constructions.

	Scenario 1: Factual	Scenario 2: Counterfactual
Condition	Charles does not pass his A levels.	Charles passes his A levels.
Consequence	Charles does not get an apprenticeship	Charles gets an apprenticeship

In Easy Language, this structure would have to be transformed into a factual one (Scenario 1) and express what is really happening:

Charles has **not** passed his A levels.
Therefore, Charles **won't** get an apprenticeship.

This version is short and might be suitable for an Easy Language text. But it does not verbalise the expectation the communication partners had for Charles' academic performance: in fact, they at least thought it possible that he might pass. If this aspect is added, more sentences (and more information) will be needed:

Charles needs the A levels to get an apprenticeship.
Therefore, Charles has prepared thoroughly for the A level exam.
Nevertheless, Charles did **not** pass.
Now Charles **won't** get an apprenticeship.

If all counterfactual sentences are explicated in that way, texts will become very long. Therefore, only central issues can be outlined in so much detail, otherwise the difficulty on the sentence level will simply be transferred to the text level and will turn into more text volume. This poses a limit as to how close Easy Language translations can be to the source text.

Negation

All practical guidelines formulate the advice to avoid negation. Negative statements are more difficult to process than positive ones. At the same time, there is no language without the possibility to express negativity; it is a universal feature of language. Counterfactuals, for example, can only be explicated with the help of negation. It is not possible to renounce negation. But scenarios containing negation can be cognitively demanding (Bredel/Maaß 2016a: 460f). What is helpful is to keep the inventory of negation markers to a minimum (*no, not*) and renounce negation markers that are bound morphemes or parts of foreign words or both (like in *unbreakable, irresistible, preclude*). In order to make negation more perceptible, we propose using bold type for the negation marker:

Nevertheless, Charles did **not** pass.

Negativity in Easy Language has been and is the object of empirical research (see Bredel/Lang/Maaß 2016, Sommer 2020).

Indirect to direct speech

Indirect speech is usually expressed in compound sentence structures. In Easy Language, they are transformed to direct speech:

The president said his answer was perfect.

Easy Language:

The president says:

“My answer is perfect.”

Direct speech makes time shift phenomena disappear, which potentially pose a hazard for parts of the target groups (like migrants). But a visible marker is needed to indicate where the citation ends. Quotation marks will not always suffice, as they suggest a literal quote. But if the utterance cited in the text has also been translated into Easy Language, it is probable that the cited person has not uttered just that. Quotation marks are usually only applicable if the text really reproduces what has been said or if the persona speaking in a text does not really exist. This is the case for fairy-tales; quotation marks can be used here:

And the goblin says:

“Now give me the ring.”

In all the other cases, indentations can serve to indicate the scope of a statement reported in a text; the indentation ends with the quotation:

The president says:

My answer is perfect.

I always give perfect answers.

The chancellor does not look happy.

3.3.5 Text level

In contrast to the syntactic, and partly the word level, the rules on the text level are usually not language-bound. They are rather related to text types and general organisation processes of the text level that apply across languages. In the following, I will outline some text-linguistic and pragmatic principles that have

proven useful to comprehensibility, recall and the action-enabling potential of Easy Language. At the same time, I will point to the dilemmatic and contradictory relation between Easy Language rules on word, sentence, and text levels.

Word and sentence levels do not add up to support the text level

Texts are limited sequences of signs that are in themselves coherent and, as a whole, have a discernible function (Brinker 2001: 17). The focus is on the macro-level: together, the single words and phrases, the propositions in their entirety become a bigger entity, the meaning of which the addressees have to be able to grasp and to convert into something useful for them. Texts enlighten recipients on a subject, on attitudes and convictions of people, they induce action, produce knowledge; some also have the function of providing aesthetic pleasure. This is, however, only possible if the addressees manage to reach the text level, if they find coherent what is said, if they are able to grasp the text function. This requires them to be able to transcend the sentence level, to connect propositions, to identify the macro-proposition and main statements.

Now that can be problematic for Easy Language texts: The rules focus on word and sentence levels. On the one hand, this is necessary because if the users fail on the lower levels, if they are not able to extract the meaning, they will not be able to combine propositions and reach the text level.

On the other hand, the rules on word and sentence levels are maximally analytic: they dissolve the whole, they single out what is considered a local comprehension problem, focus on individual elements. And this at the detriment of the text level that is about synthesis, about connecting, “weaving”, “texture”. Texts are not merely accumulations of sentences in one place; they are internally and externally connected entities with an internal structure (Bredel/Maaß 2016b: 153). There is, thus, a clash between the rules on word and sentence levels and about what constitutes the text level: arguments are interconnected, consequences are intertwined, information is gradually built up (and the conceptual basis of this building might be part of other texts that are referred to in a text).

At the same time, some Easy Language target groups have a limited capacity to process new information. Other Easy Language target groups might have regular information processing capacities but so little previous knowledge on the subject (as they are from a different culture, not regular readers or as there are so few accessible texts on the subject) that a single text has to build up this knowledge rather than presuppose it. But what can be said in and achieved with one single Easy Language text is quite limited.

Standard language has complex linguistic means at hand to display complex subjects and relations in texts. Easy Language, in contrast, is limited in grammar and vocabulary to the central elements that are assumed to be processable by the target audience. Strict layout conveniences that are intended to increase perceptibility lead to texts that are visually homogeneous. The cost of increased perceptibility is a loss of information on the text level: the standard text immediately signals the domain it belongs to. If all Easy Language texts are designed in the same way and basically look alike, as is the tendency, for example, in Germany (see Maaß 2019a, Chapter 1.4.2 in this book), this information is cancelled. Readers do not have this “first impression” that allows them to allocate the text to a text type and anticipate the macro-proposition and function. They have to exploit the text bottom-up, hoping to reach the top. The top-down perspective that readers of the original versions get, is hampered. This further limits the options to display complex subjects in Easy Language texts.

Easy Language: Reduction and addition strategies

Easy Language texts are produced by a combination of **reduction** and **addition** strategies, the dynamics of which are not necessarily beneficial to the text level.

The **reduction strategy**, which is omnipresent in Easy Language texts, comprises all measures that reduce the available linguistic inventory in standard texts to a minimum by means of enhanced comprehensibility (Bredel/Maaß 2016a: 489ff, 2016b: 154):

- renunciation of greater parts of the lexical inventory and restriction to what is learned early and unlearned late in life and refers to everyday commonplace concepts
- renunciation or careful handling of abstract and foreign words or terms of any kind
- restrictions in the field of stylistic means (tropes, diversity in register, variety of anaphoric resumption)
- restrictions in syntax with respect to compound sentences
- restrictions with respect to verb forms, use of the case system, of pronominal anaphora, etc.

The text subject remains complex (for example, a text on inheritance law will still have to explain hereditary succession etc.), but the linguistic means are

basic. The reduction strategies on word and sentence levels bring about a shift of this complexity to the text level.

This is palpable in the concurrent omnipresence of the **addition strategy**. The addition strategy is complementary to the reduction strategy. It is, again, intended to create comprehension on word and sentence levels. It comprises all measures to locally build up the knowledge necessary to understand what is being said in a text. It is a precondition of comprehension, but it does have its side effects. Easy Language texts are strategically enriched with ...

- ... explanations and exemplification of terms and peripheral lexical material of all kind. Each explanation or exemplification interrupts the argumentation process. Of course it is of no use to build up an argument on a word that is unknown by the readers. But to introduce a new word or concept into a text by locally inserting an explanation and then resuming the argument with the newly introduced term presents quite a challenge not only to users with communication impairments. Easy Language users will not be able to understand texts containing too many new concepts and still successfully follow the line of argumentation. This limits which texts and text types can be expected to be actually helpful in enabling the users to act. If the text subject is entirely new to the users and a single text introduces 15 new concepts and directly works with them, this text will not be accessible.
- ... explicitations of implicatures and presupposed knowledge of all kind. Implicatures are, among other things, favourable for supporting the economy principle. To renounce them and lay bare what is implicit increases the text volume.
- ... visualisation of concepts, examples and parts of the text message. It is not straightforward to illustrate complex concepts (an overview of the different kinds of subjects and possible visualisations in Bredel/Maaß 2016a: 271ff); thus, the authors tend to illustrate texts rather than use images to build up knowledge. Illustrations might work favourably on the motivational barrier (see above, Chapter 1.1) but they further increase the text volume.
- ... a perception-optimised layout: only one sentence per line, increased character size and line spacing etc. also belong to the strategy of addition as they make the text longer even if only part of the source text information is rendered. These conventions lead to increased

perceptibility of the single words and sentences which is a necessary precondition to understanding. At the same time, the “texture” is not as easily discernible as in regular texts because interrelated pieces of information are physically separate and the user has to reintegrate them. What is beneficial to perception, might be detrimental to comprehension (see Chapter 1.4).

To summarise, the text level is a major challenge in Easy Language translation and the rules on word and sentence levels do not tend to be helpful for comprehension and action-orientation on the text level. The reduction and addition strategies affect two important text qualities (Bredel/Maaß 2016b: 157):

- 1) The reduction to basic linguistic means and the uniformity of layout conventions make it difficult to discern the different text functions on a macro-level.
- 2) The addition of explanations, exemplifications, illustrations, together with the reduction to the basic lexical and grammatical functions threaten text coherence in Easy Language texts.

And as it transpires, there is no easy way out. After having pointed to the fact that the text level is a big challenge in Easy Language, I will indicate some possible solutions that help shape Easy Language texts.

Adjusting texts to the users

Easy Language texts have to be adjusted to the intended target audience (Bredel/Maaß 2016b: 166f). This should be essentially the same for all texts, but more experienced readers (or recipients of text in the larger sense of the word) are usually able to compensate to a certain degree if texts are not adapted to their needs. In the Easy Language target groups, these skills are usually less developed. What kind of information and via what sensory channel they are able to process depends on the nature and degree of their impairment; to single out this need and develop text strategies is the subject of accessible communication and Easy Language research and practice.

Especially on the internet, texts are not usually addressed to just one user group with a specific profile. In contrast to online communication, there are other circumstances, like an Easy Language interpreting or classroom situation, where the special needs of the addressed group or person might be well-known. Such clearly defined circumstances are favourable in order to adapt the

texts to the comprehensibility degree and to a form of media realisation that is processable for the intended audience.

On the text level, the question of information structure has to be addressed. Persons with cognitive impairments will have problems processing complex structures on any level: not only linguistic complexity, but also the complexity of the subject and the information structure as such potentially pose problems for them. Texts do not only present linguistic or expert language / expert knowledge barriers, but additionally also cognitive barriers (for the barrier types see Chapter 1.2). In Gutermuth's (2020) study, the group with cognitive impairments did not profit from word structuring with the mediopoint in the same way the other target groups in her study did, as the text subject (online information on the transparency law of the German Federal State of Rhineland-Palatinate) was too complex and therefore the cognitive barrier remained even in the Easy Language translation. That means that people with cognitive impairments might not be able to comprehend abstract and complex text subjects no matter how comprehensible their linguistic form is (see Chapter 1). If texts are directed towards this target group, translators have to ponder what kind and what amount of information can be placed in a text at all. Certain contents of legal or administrative communication or other expert content might not be processed irrespective of how comprehensible the word choice and sentence structure are. This poses a limit to what may be rendered in Easy Language for the target group with cognitive impairments.

In Bredel/Maaß (2016b: 167), we propose two possible coping strategies:

- 1) To massively reduce the information rendered in the text. The Easy Language target text will then only give a rough orientation of the subject and will not grant participation that is direct enough to not make the users depend on others. On the contrary: They will not be able to carry out the actions induced by the source text. What is more, the text will most probably not be informative enough for the target groups without cognitive impairments. Nevertheless, this strategy is the one that grants the target group with cognitive impairments direct access to information. The idea that this group might directly exercise their own rights on the basis of those texts is an illusion.
- 2) To bring the text into a form that is linguistically adapted to the needs of the target group, but still presents a cognitive barrier to them, the text being too long, too information rich, too complex or

abstract, because the same amount of information is conveyed as in the source text. The target groups will not be able to grasp the text subject by reading on their own, but the texts can be used as a basis in a communication situation: The texts are used as a basis for the exchange with an expert or an intermediary who does not need to produce comprehensible expert-lay communication ad hoc, but can rely on the Easy Language text. This also applies to the situation that 60–70% of the people with cognitive impairments do not have sufficient reading skills (Ratz 2013) to process even Easy Language texts and will have to rely on oral communication anyway. Other target groups like weak readers, migrants or prelingual hearing impaired people are often confronted with a language or expert language barrier, but not to that extent with a cognitive barrier. In general, those groups can process texts that contain complex or abstract information if written in Easy (or, partly: in Plain) Language. Easy Language text offers allow them to receive information in a form that is linguistically adapted to their needs.

A possibility to reconcile both strategies would be to give short outlines of the text subject that tackles the language as well as the cognitive barrier, and to give more detailed information separately (Rink 2020: 228, 301):

- A short outline in the form of an abstract or a summary as the first part of a brochure or webpage information;
- In the case of online information: more detailed information embedded in the deeper structure of the hypertext;
- Further information in separate texts (“You want to know more about ...? Here is where you find it:”) etc.

Adjusting texts to the target situation

Texts need not only be adjusted to the target audience, but also to the target situation. This is an aspect that is often not adequately taken into account. Easy Language texts are not only used in a reading situation, but in many other situations they have to be adapted for if they are to work properly.

In Bredel/Maaß (2016b: 168ff), we present different target situations and give a short outline of the potential impact for text design. More details for legal communication can be found in Rink (2020).

Texts may be embedded in communicative situations where other resources are also used, for example if a doctor explains how an operation will be carried out using a model of the human body or body part and his or her hands to point out what will be done. Doctors might find it helpful to have an Easy Language glossary at hand that explains the main terms that will be needed. This situation differs greatly from a situation in which the patients have to retrieve the information by reading on their own without the possibility to ask questions or to get more information input from non-readable sources.

Texts can also be designed for reading them out to the target audience. This is a frequent use, as considerable parts of the Easy Language target audience are not readers or only weak readers (see Chapter 5.6). If texts are explicitly designed for such situations, their visual gestalt may be of minor importance compared to texts that are optimised for autonomous reading.

Interaction texts are used to instruct readers as to what actions they will have to perform in order to make the text work according to its purpose. Those actions can be visualised in order to facilitate the text-situation transfer. And there are situations where source text and target text are used simultaneously. This occurs, for example, in inclusive teaching situations where students with and without communicative disabilities work on the same task but with instruction texts of differing complexity levels. This will only work if source text and target text are structurally similar so as to make cooperation across texts possible.

In some situations, Easy Language texts make a contribution to enable the target audience to adequately participate in complex environments where different kinds of code systems have to be combined in order to retrieve information and act adequately. This is the case in inclusive art events like opera or theatre (Mälzer/Wünsche 2019a, Mälzer 2017), a visit to the museum (Schum/Rantamo 2019, Al Masri-Gutternig/Reitstätter 2017) or to a recreational park (Kröger 2020).

Texts are also embedded in text worlds. This intertextuality may pose problems if not all the texts a source text refers to are in Easy Language or if an Easy Language text offer is surrounded by non-easy texts. This is frequently the case, especially for online communication where Easy Language text offers are embedded in the regular website of an organisation, administrative body or business company. The alternative is to set up “Easy Language only” websites as is the case for providers of social welfare or disability work. These are, though, not inclusive offers in the strict sense. If Easy Language online texts contain links that lead to non-easy text offers, this has to be expressly marked.

If Easy Language texts are integrated into regular websites, comprehensibility is not the only issue; retrievability will be at stake, too (see Chapter 1.4.1).

Actively shaping the information structure

The addition strategy of Easy Language (see above) tends to increase the text volume; translators will therefore have to single out what information will be part of the target text. In Maaß/Rink (2020; referring to Rink 2020: 99ff), we point out that there are different scenarios of Easy Language translation with regard to text volume:

- **Scenario A:** The target text contains the same amount of information, but is excessively long. This will be the case if the translator decides to not eliminate information from the target text or if the text type requires all the information of the source text to be in the target text. Interaction texts will often require translators to proceed that way. Texts that are designed according to scenario A will not be sufficiently accessible to the regular Easy Language audience on the text level as such texts simply shift complexity from word and sentence to text level.
- **Scenario B:** The target text is short enough for the users to process, but does not contain enough information to form solid concepts on the subject. Such texts imply that the target audience will not understand the source text information anyway and do not even make an attempt to render their content. Texts that follow scenario B are trivial and poor in information and are not sufficient to grant participation.
- **Scenario C:** The target text is retrievable, perceptible, comprehensible, linkable, acceptable and action-enabling. It is correct and functional for the target situation. These qualities as a whole make a communication accessible (see Maaß 2019a: 294, 2019b, Rink 2019: 101 and Maaß/Rink 2019, 220 as well as Chapter 1.4). Scenario C is the benchmark and gold standard of Easy Language translation. It “comprises texts that exhibit these characteristics on word, sentence and text levels as well as in their medial realisation. They build up knowledge resources and represent the subject adequately without consuming too much of the target audience’s cognitive capacity. They are neither overly long nor too short and trivial. They enable the users to act appropriately in the target situation.” (Maaß/Rink 2020: 47)

The orientation toward Scenario C is necessary in order to produce accessible texts that enable participation; they put a limit on Easy Language machine translation, as this requires far-reaching interventions on the text level (for the state-of-the-art in Easy Language machine translation see Hansen-Schirra et al. 2020a). Text linguistic and user centred research will have to establish criteria that indicate how to get as close as possible to Scenario C; the solutions will be dependent on text function, text type, and they will be target group specific.

The medial realisation of the text as an asset

Easy Language texts will have to be designed according to their media realisation. Print and online publications, but also other realisations like subtitles lead to different conceptual and media opportunities and restrictions (Maaß/Hernández Garrido 2020). Print productions usually have limitations with regard to the page volume depending on the layout of the brochure or other print product. Restrictions are even more pronounced in the case of audiovisual realisations like subtitles or audio descriptions as they are time-based and have to keep pace with the audiovisual material (Maaß/Hernández Garrido 2020). This will mostly lead to information being omitted in the target text; translators become information gatekeepers and have to assume this responsibility (Maaß 2019a, b, Rink 2020: 442, and below; this impact has been researched for interpreting situations see Davidson 2000). In online formats, information can be transferred to separate texts that are linked to the shorter main text that contains only basic information (Rink 2020: 301, 450f).

Easy Language texts often work with images; conventions as to what style of imagery are considered appropriate differ greatly (see Bredel/Maaß 2016a: 271ff, Alexander 2019, Pridik 2019; Maaß 2019a).

As the Easy Language target groups include illiterates and weak readers, audio versions of a written text may be helpful. For online offers, readers can profit from software solutions, if their media competence is sufficiently developed to find and use such offers. This is the most inexpensive solution, but artificial voices might present some problems to the target audience if they do not pronounce names or ambiguous words correctly. A text read out by a professional human speaker is a high-quality experience and may facilitate comprehension by adding paraverbal information via emphasis, pitch or ductus. On the minus side, texts will have to be recorded again every time the written text is modified. Human voice renderings will thus not be practicable with information offers that undergo frequent change. Audio versions can also be used with print texts if, for example, QR codes are integrated in the printed

text offer that lead to the audio track on a website (Bredel/Maaß 2016a: 215, 2016b: 171).

Directly addressing users

The action enabling potential of texts can be substantially increased if users are directly addressed so that users can relate directly to what is said (Bredel/Maaß 2016b: 163). This strategy is again dependent on the text function. Users have to be addressed in an adequate manner (formality, politeness and age appropriateness of address). Positive politeness strategies (Brown/Levinson 1987, Maaß 2014) and direct requests are to be preferred as they are more direct and show less divergence between superficial linguistic and deep semantic structure. They are potentially less polite as indirect strategies leave more options; the latter are, however, less comprehensible (Bredel/Maaß 2016a: 507ff).

Accentuating positions and different voices in the text

Texts often display different discourse positions and voices (Bredel/Maaß 2016b: 165). This is either done directly via citation of an utterance in the text or reference to another text. Texts are rooted in discourse and often reply to discourse position that are presupposed as known to the audience. In Easy Language texts, discourse positions and different voices have to be made explicit.

- Who says what to whom and referring to what text subject?
- Is a position binding for the text users or just an opinion or option?
- What are the possible options for action that derive from these positions?

Standard texts often do not give exact information on who executes an action or who is the contact person that can be addressed for further information or help (Rink 2020: 450) and how this can be done (Bredel/Maaß 2016b: 165). This information has to be added in Easy Language texts to make them functional to the target audience. This might present a challenge for translators as such information is often not part of the source text and has to be procured in the translation process. Thus, Easy Language translation will demand a major effort from translators and will call for close collaboration with the contracting authority or business client (in Bredel/Maaß 2016b: 54ff we describe typical work flows in Easy Language translation).

Pros and cons of glossaries and text boxes

The strategy of extensive explanation and exemplification in Easy Language texts is a burden on the text level: it makes texts longer and interrupts the argumentation flow. This can be avoided by separating word explanations from the main text, for example in form of text boxes or glossaries. The text becomes more compact and exhibits a more straightforward argument structure. As we point out in Bredel/Maaß (2016a: 269f, 2016b: 163f), this strategy has a serious disadvantage: It is only helpful to such readers that basically do not need the explanations or need only a small part of them. Readers that need the explanations will have to interrupt their reading process and look up words in the glossary. If it is a glossary in printed material, they will have to be able to look up items, for example by locating them in an alphabetically ordered list. But even for online glossaries, they will have to leave their present reading point. They will then have to memorise what they have read before, jump to the explanation, memorise the explanation, too, and go back to reading the text while integrating the old information read beforehand with the newly acquired information. This is a cognitively demanding procedure that requires text expertise and an extensive attention span. Both are not typical characteristics of the Easy Language target audience. A glossary is, thus, only applicable in such cases where the larger part of the intended audience can do without the glossary entries.

Optimising the macrostructure of the text

Comprehensibility and text linguistic research (see Christmann/Groeben 2019 for an overview) established long ago and proved in multiple scenarios that comprehension is facilitated by a visible and plausible macrostructure. Comprehensive reading requires concurring and intertwining bottom-up and top-down procedures (Bredel/Maaß 2016a: 121ff). Of course, word comprehension is the prerequisite for comprehending sentences (or propositions) and this, again, is a prerequisite for understanding texts (Richter/Christmann 2002). On the other hand, knowledge of text types, presuppositions on text functions and previous knowledge of the subject are essential to successful information retrieval (Bredel/Maaß 2016a: 118). Readers have an active role in the reading process (Groeben 1982: 8, Christmann 2006; Schnotz 1994), they construct sense by comparing what they read to their knowledge and expectations and by forming hypotheses on how the text argument will continue (Bredel/Maaß 2016a: 121). This process is substantially supported if the main argumentation is visible in the macrostructure and carved out by highlighting and visualisa-

tion strategies. The main tools to achieve this goal are presented in the following sections. They are not limited to Easy Language but are amply used in Easy Language texts.

Advance organisers, subheadings and marginal notes

Advance organisers are short introductions at the beginning or in front of a text that give information on the main propositions and most relevant text concepts. Christmann/Groeben (2019: 132) call them “anchor ideas”; they facilitate the integration of the single pieces of information given in a text as they create a frame of expectancy that is subsequently synchronised with the information retrieved from the text. Rink (2020: 410 et passim) shows how advance organisers are used in different legal and administrative text types in Easy Language and enhance the comprehensibility of those texts.

Subheadings and marginal notes give information on the macrostructure of the text. They activate previous knowledge on the level of text sections and paragraphs and thus enable top-down processes to interlock with the bottom-up reading results (Bredel/Maaß 2016b: 161).

Indentations and lists

In German Easy Language texts, the typical line structure is eliminated in favour of a list structure: Each of the preferably short sentences is placed on a new line (for an example, see Chapter 3.3.1). This measure aims at better perceptibility on the sentence level; it has yet to be established if the possible gains on the sentence level are really backed up by the losses on the level of text comprehensibility and overall acceptability (see Chapter 6) as they lead to a sharp contrast between Easy Language texts and standard texts.

It is, however, plausible that the use of bullet lists and the highlighting of different text functions via layout features are helpful to structure the text level. As the example in Chapter 3.3.1 from an Easy Language news text shows, explanations of single words and concepts are marked by indentations and italics. The italics are used to distinguish between word explanations and direct speech that are both marked by indentations (see my remarks on “indirect to direct speech” in the sentence level section). The indentation shows the beginning and end of the explanation or quotation and enables readers to see where the text argument resumes. The explanation still interrupts the text flow, but beginning and end of the interruption are made visible for more text coherence. We assume that this extra information on the text level will facilitate text comprehension for Easy Language readers and might even allow advanced

Easy Language readers to skip explanations they do not need as they can perceive where the explanation ends (Bredel/Maaß 2016b: 161ff).

Highlighting important information

Highlighting important information increases perceptibility and helps text users grasp the argument structure. All Easy Language guidelines include regulations on visual aspects of the texts. Perceptibility is enhanced by the use of certain fonts (without serifs or decorative elements) (a discussion and first research results with the primary target groups in Alexander 2019), greater font size and line spacing, arrangement of lines and larger amounts of white space on the page. These measures might locally improve information retrieval but come at a price at the text level. Moreover, the guidelines recommend the use of boldface and frames to highlight important information; some guidelines ban italics and underlines as they interfere with the regular font type; at the moment, there are no research results, though, that back up or discard that assumption. Online texts will have to work with underlining as this is the conventional way to mark links. Bold face is also used to highlight negation markers (“no”, “not”) in order to make them better perceptible and prevent readers from overlooking them (Bredel/Maaß 2016b: 148; a first empirical approach on highlighting negation is Bredel/Lang/Maaß 2016). Important text passages can be marked by boxes (Bredel/Maaß 2016b: 163).

Use of images and visual guidance systems

Images and visual guidance systems like colour coding can be used to carve out the macro-structure of a text. If images are, as is often the case, used to explain and exemplify on the word level instead, they can hamper the text level as they make single pieces of information that are easy to visualise salient, possibly at the detriment of more information that is more important on the text level but less easy to visualise (Bredel/Maaß 2016b: 162, Maaß/Rink/Zehrer 2014).

In Germany, one influential direction of Easy Language rules champions the use of a single set of images. To do so hampers the text level as texts of all text types look alike; this obstructs the top-down reading processes necessary to comprehend at the text level. Another significant shortcoming of this imagery is its poor acceptability outside the Easy Language community (see Maaß 2019a and chapters 5.8 and 6).

3.4 The symbolic function of Easy Language

Texts of the type accessible communication contribute to inclusion if they provoke little or no deterrence and are adapted to the standard as far as possible while still maintaining a high degree of perceptibility and comprehensibility. In Chapter 3.3., I described features that contribute to Easy Language texts being easier to perceive and to comprehend. But Easy Language is not only employed in the function of making content accessible. It also has a symbolic function: Easy Language texts are a symbol for the group of people with cognitive impairments. When the texts are publicly displayed, this group is made visible to the broader public. Easy Language texts that have been produced by involving people with cognitive impairments in the text production process (mostly in the assessment or validation processes) are perceived as a symbol of participation.

Organisations (like public administrations) display such texts on their websites to make their inclusion efforts visible. They signal that they comply with the respective legal requirements (see Chapter 2.3).

Such Easy Language texts often stress their differentness. So on the inside, Easy Language becomes a symbol that creates commonality among the primary target groups, especially those with cognitive disabilities. Easy Language texts are “their texts” and to see them publicly displayed, for example on the website of a Federal Ministry, is a symbol for their visibility as a group. Although language is often used to establish group identity (Maaß 2002, Janich/Thim-Mabrey 2003), Easy Language is intrinsically not a good candidate for group identity processes (see Chapter 5.6.2): It has maximally enhanced comprehensibility and is restricted to the core inventory in lexicon and grammar with the intention that “everyone” can understand it – quite the opposite of a sociolect. It is asymmetrical in address and the primary target groups are on the receiving end of comprehensibility-enhanced communication; they are not independent text producers of Easy Language.

Easy Language has nonetheless contributed to group identity for the target group with cognitive impairments; hence the attempts made by the empowerment movements to claim Easy Language for this group and to ensure that people with cognitive impairments can actively participate in the production processes and to declare them the real experts of Easy Language.

Maximally different Easy Language texts deter people with standard expectations, this deterrence being at least partly intended: The secondary target groups are in fact indirectly addressed with those texts that stress differentness

and force them to recognise that disability exists and that affected groups are provided with legal rights. In Germany there are, in fact, legal obligations to provide Easy Language texts in certain public spaces (like websites, see Chapter 2.3) so that the texts – as well as the primary target groups for whom they are perceived to stand symbolically – have to be tolerated by the secondary target groups. Easy Language texts that stress their differentness are a symbol of these rights. As a part of this differentness, they are perceived as a provocation by parts of the secondary target groups. This may well be intended, as provocation is an effective means to make a group perceptible and achieve political change.

But this strategy has a downside: it is the opposite of inclusion. In a democratic society, inclusion is only possible if the measures taken to grant it do not meet enduring active resistance from the majority of people. Easy Language in its empowerment activism form regularly meets strong opposition, especially if Easy Language texts are felt to be intended as the new standard (see chapters 2.4 and 6.2) or if they visibly defy grammatical, orthographic, layout and text type standards. Incorrect hyphenation is a strong differentiation marker and reliably provokes the secondary target groups. Research results (Gutermuth 2020, Deilen 2020) show that the gain in perceptibility is small or inexistent and is by all means disproportionate to the damage caused with respect to the acceptability of Easy Language and its public presence. But the insistence on the hyphen on the part of the empowerment movement shows that the hyphens are used to mark Easy Language texts as different. The texts are not intended to blend in.

Markedly different Easy Language texts are also used by contracting authorities as symbols to display their inclusion friendliness. Enterprises and organisations like administrations or political parties use the Easy Language texts in print or on their websites not only to address the primary target groups, but also to signal their effort to achieve inclusion. When they do so, they make texts publicly visible, which is a form of indirect address of the secondary target groups.

This symbolic component is also present in other forms of accessible communication. When making accessible communication offers, enterprises and institutions position themselves publicly and want their position acknowledged. To publicly display samples of accessible communication is an indirect communication act with the bystanders, that is, the secondary target groups.

An example from outside the Easy Language cosmos are visiting cards with braille elements. Enterprises and organisations that use those cards directly address blind braille readers as their primary target group. Moreover, they indirectly address everybody else by signalling that they take inclusion seriously. Given the fact that braille readers are a small minority even among blind people, these secondary target groups by far outnumber the primary target groups. It is very probable that the number of primary uses of those visiting cards are in the range of per million, while the secondary purpose of signalling “we are inclusion friendly” is the real – even if implicit – goal. The use of those visiting cards as samples of accessible communication is therefore predominantly symbolic.



Figure 15: Visiting card with braille elements of the Research Centre for Easy Language

This is slightly different for Easy Language texts, as in this case the number of potential readers from the primary target groups is much bigger than in case of the braille visiting cards. But the choice of texts (that are very often not the texts requested by the target groups) and the way they are displayed suggests that the symbolic function sometimes outweighs the original function to make communication accessible to the primary target groups.

The symbolic function is also conveyed through the use of Easy Language logos. The most widespread is the Inclusion Europe logo:



Figure 16: Inclusion Europe easy-to-read logo

Among the conditions to use it, is the following (Inclusion Europe, Using the easy to read logo conditions, for a comprehensive list of conditions see Maaß 2015: 170f):

“3. One or several persons with intellectual disability whose native language is the language you are using in your publication should proof-read your publication. The name of the proofreaders should appear in the brochure.”

The logo demands participation of the primary target group in the text production process. Participation in the process of text production will regularly lead to Easy Language texts that display differentness and do not blend in with the standard. The contribution of this proofreading to text quality is limited, but it has a high symbolic value. Paradoxically, identifiable texts that ensure participation of the people with cognitive impairments in text production processes are a potential hazard to inclusion.

3.5 Quality assessment for Easy Language

Translations, interlingual as well as intralingual, usually undergo quality assessment. This is necessary for the clients and contracting authorities in order to evaluate the quality of an offer. In Easy and Plain Language translation, there are two fundamentally different methods in use: Assessment of the pro-

duction process or assessment of the product, that is, of the translated text. In product assessment, the single text or a text practice can be assessed. The different processes involve different discourse participants.

3.5.1 Text assessment

Many Plain Language guidelines (see Chapter 4) intend for the translations to be assessed by members of the target groups; in practice though, Plain Language texts are rarely assessed that way. Usually, they are summarily screened by the tendering authority in a presentation meeting or in personal contact with the translator. More frequent for Plain Language texts is assessment during the writing process with the help of authoring tools or after the writing process with comprehensibility software (see Bredel/Maaß 2016a: 201) that give authors a rough impression about the formal linguistic comprehensibility features of their text.

For Easy Language texts, there is a more widespread practice to involve the primary target groups – especially the group of people with cognitive impairments – in text assessment processes. This form of text assessment has its pros and cons:

- + It shows active involvement of people with disabilities by the contracting authority.
- + It is part of the process to appropriate Easy Language as a tool for group identity.
- + It provides remuneration as well as recognition for the primary target groups.
- + It often leads to improved reading skills and comprehension of the members of the primary target groups that are regularly involved in those assessment processes.
- + It helps translators form their assumptions with regard to the primary target groups and their comprehension.
- + It helps legitimise Easy Language translators without disabilities and displays their connection to the target groups.

- Due to the heterogeneous and highly individual nature of a disability, the results of such assessment measures are inconsistent.
- Due to the priority given to the group of people with cognitive impairments, primary target groups with other profiles are neglected and the texts are optimised with regard to the preferences of the tar-

get group the text assessors belong to, or even the specific personal needs of the assessors.

- This form of evaluation leads to text orders being placed by contracting authorities not on the basis of text expertise, but on the basis of available assessment facilities. The result are many texts with poor quality as agencies are preferred that have direct contact with the target groups but are not necessarily trained translators.
- The text production processes are increased in price and slowed down. This leads to a smaller number of texts being produced for the same amount of money, contractors economising on text quality, and fewer texts of text types that are quick in production and consumption (like news or frequently updated parts of homepages).

3.5.2 Assessment of the production process

In interlingual translation, quality assessment has shifted from the single text to the production process. This is done under the assumption that high-quality processes lead to high-quality results. In fact, the international translation norm DIN EN ISO 17100 (2015) on requirements for translation services focuses on the quality of the translation process as a measure for the quality of translated texts. The translation process is evaluated on the basis of criteria like the minimum qualification requirements of the participants, the availability and management of resources etc. Resources are, besides the technical and technological means, above all the human resources and include translators, revisers, reviewers, proofreaders and project managers that should all have adequate training and skills. According to ISO 17100, high-quality translations are usually produced under circumstances where competent professionals with certified qualifications carry out the translation in a technologically equipped working environment with adequate data protection. Among the competences required for professional translation, ISO 17100 names translation competence, linguistic and textual competence in the source and the target language, competence in research, information acquisition, and processing, cultural competence, technical competence, and domain competence. The translation is preceded by a pre-production process where the necessary form and function is negotiated between the translator and the contracting authority or client. This aspect is very important for Easy Language translation where profound interventions in the texts are necessary in order to make the target texts work. In addition, the text function changes much more frequently than in interlingual translation.

The translation then passes through different steps including translation, revision, proofreading and final verification. These steps are distributed among more than one professionally trained person in order to achieve a fresh perspective of a text. The idea that Easy Language translators need certain translation-related competences and that it does not suffice to have an untrained person translate texts into Easy Language and have them assessed by some people from the primary target groups in order to generate a functioning target text is still not very widespread.

A high-quality translation process also comprises a feedback-process where the client gives input on how useful the text is. In Easy Language translation, this step is hindered by the fact that Easy Language conveys stigma and clients might feel awkward in expressing their concerns about the target text that they might think deviates from what they expected (see Chapter 6).

Last but not least, high-quality translation includes data management in the form of terminology management and post-processing the alignment of the source and target texts. Easy Language has a special profile here (Hansen-Schirra et al. 2020a) that requires a professional effort to build up a useful resource for future translations. Easy Language translation is considerably lagging behind with respect to the interlingual translation standards as this stage is, at the moment, not part of the usual working processes in Easy Language translation.

4 Plain Language and its equivalents

4.1 Is Plain Language the solution?

In contrast to Easy Language, Plain Language is closer to and in parts identical with the standard language. Plain Language texts address people for whom the source texts are too hard to understand; in the case of expert-lay communication, the term is used to designate the non-elaborate code of standard language as opposed to expert language. Plain Language texts do not primarily address people with communication impairments as they may not be comprehensible enough for this target group. In the German Act on Equal Opportunities for People with Disabilities (see above, Chapter 2.3.2), Plain Language is only the first step toward comprehensibility: If it does not suffice, it will be replaced by an Easy Language version. In the National Action Plan Health Literacy (see above, Chapter 2.3.2), Plain Language is primarily meant to address migrants/people with German as a second language, not people with communicative disabilities. As far as perceptibility and comprehensibility are concerned, Plain Language is thus closer to the standard than Easy Language and might not be sufficient for people with enhanced communication needs.

At the same time, reactions toward Plain Language tend to be rather positive: Plain Language is seen in the context of removing red tape from communication and making it comprehensible to non-expert everyday people. Plain Language has proven to be largely acceptable to the broader public. Furthermore, its use might even go unnoticed; Plain Language texts do not violate standard language rules and expectations and are generally unobtrusive. The risk of stigmatising readers through a well-executed Plain Language text is considerably smaller than for Easy Language.

But is Plain Language sufficient to grant access to people with communication impairments? In the following section, I will delineate the origin and rules of Plain Language as well as its current situation.

4.2 Plain Language approaches on an international scale

In the English speaking world, it is Plain rather than Easy Language (or easy-to-read, see Chapter 2.2 for terminology) that has a rich history of guidelines and text practice. The Plain Language movement has been growing since the 1970s (Adler 2012, Cornelius 2015, for the legal context see, among others, Asprey 2010) and has offered different approaches to define its subject of research. Cheek (2010) differentiates three different categories of definitions:

- 1) the “numerical or formula based” approach that “defines plain language primarily through specific elements of readability” (Cheek 2010: 5),
- 2) the “elements-focused” approach, that “is based on the techniques used to write clearly” with respect to structure, design, content and vocabulary (Cheek 2010: 6) and
- 3) the “outcomes-focused” approach that “focuses on how well readers are able to understand and use a document” (ibid.).

It appears, though, that the three types of definitions look at the phenomenon from a different perspective and may also be a component in the same approach rather than belonging to distinct approaches: “element-focused” approaches with a style-guide attitude that are partially “formula based” are combined with “outcome-focused” proposals to have the texts evaluated by the target audience (see below for examples).

Some of the efforts date back to the early 20th century where they were applied in literacy training for the working class. An example is the work on Plain English by Wharton (1917), dedicated to “the education of the workers by the workers” in the context of English Language teaching. Wharton “focuses students’ attention on the mechanical aspects of producing clear and easily accessible texts” (Greer s.a.), a dominantly formula-based approach in terms of Cheek’s (2010) distinction. Efforts have stepped up since the late 1960s when the concept was endorsed by the White House (Bredel/Maaß 2016a: 63): Especially the presidents Carter (1978, Executive Order 12044) and later Clinton (1998, Memorandum on Plain Language in Government Writing) supported Plain Language for communication between experts and citizens in legal or administrative communication. The goal was to open the administration and courtrooms to citizens and enable them to understand the procedures and act

on the basis of that information. Dyer (2017) reports on the effects that Plain Language forms have in US courtrooms:

“[C]ourts have found that plain language forms enable non-specialists to do a better job in completing the forms so that they are more acceptable to the courts and reduce costly delays. Also, court orders written in plain language are better understood and lead to better compliance by the litigants.” Dyer (2017: 159)

There are guidelines and instruction manuals for Plain Language issued by different US American government bodies like the United States Securities and Exchange Commission (SEC) that are exemplary for a whole number of similar manuals that instruct authors to write in Plain Language. Since the mid-1990s, the Plain Language Action and Information Network (PLAIN, plain-language.gov), “a group of federal employees from different agencies and specialties” (plainlanguage.gov/about/) have promoted Plain English for administrative communication. As is typical for Plain English, they issued a manual that starts with an analysis of the reader’s perspective and goes on to describe measures on the word, sentence and text levels as well as layout prescriptions and ends with the recommendation to have the documents evaluated by the users; thus, in terms of Cheek (2010: 6), they present a combination of elements-focused and outcomes-focused components. The manual even gives concrete advice on how the interviews should be conducted:

“Try to conduct 6 to 9 interviews on each document.

Ask the participant to read to a specific stopping point, known as a cue. Each time the participant reaches a cue, ask the participant to tell you in his or her own words what that section means. Take notes, writing down the participant’s explanation in the participant’s words. Do not correct the participant. When you review your notes later, wherever participants misunderstood the message, the document has a problem that you should fix.

Ask additional, open-ended questions.

What would you do if you got this document?

What do you think the writer was trying to do with this document?

Thinking of other people you know who might get this document:

- What about the document might work well for them?
- What about the document might cause them problems?

This last question is important because sometimes people are more comfortable telling you what they think others might find confusing, rather than admitting that they don't understand something themselves.” (Federal Plain Language Guidelines 2011: 102)

In 2010, the Federal Plain Writing Act (H.R. 946) was signed. It requires that federal agencies use a language in their communication with citizens that the latter can understand. The term “Plain Writing” is defined as follows: “The term ‘plain writing’ means writing that is clear, concise, well-organized, and follows other best practices appropriate to the field and intended audience” (Section 3.3). The act covers documents addressed to citizens as well as online information: Every agency has to “create and maintain a plain writing section of the agency’s website as required under paragraph (2) that is accessible from the homepage of the agency’s website” (Section 4.a.1.E). The guidelines to be followed are those developed by the Plain Language Action and Information Network (see above) or guidelines of the issuing agency, if they are consistent with these guidelines (Section 4.c.2.B). Thus, Plain Language is used as a tool for expert-lay legal and administrative communication.

The Plain Language Association International (as well abbreviated as “PLAIN”, plainlanguagenetwork.org/; a short insight into this and other similar institutions in Pedraza Pedraza 2019: 120ff) claims to be “the international association for plain language supporters and practitioners around the world”. By their own account, their members are from 30 countries and communicate in 15 languages or more. Referring to the International Plain Language Federation, they define “Plain Language” as follows:

“A communication is in plain language if its wording, structure, and design are so clear that the intended audience can easily find what they need, understand what they find, and use that information.” (plainlanguagenetwork.org/plain-language/what-is-plain-language/)

One of the founders of this PLAIN Association is Martin Cutts, author of the Oxford Guide to Plain English (¹1995, ⁵2013). According to Cutts (2013: xiii), Plain Language texts are directed toward a mass audience and “need to be pitched at about reading age 13”, because this is apparently the average reading age among adults, according to the UK’s National Literacy Trust. As for the language level, he stresses that “Plain language is not an absolute: what is plain to an audience of scientists, bridge-players, or philosophers may be obscure to

everyone else” (Cutts 2013: xiii), other varying factors being language diversity and changes in space and time.

As the Plain Language concept comprises user orientation and is usually executed not by Plain Language professionals but by the respective administrative, medical, or other staff for their particular action fields, that is, by the domain experts (see Chapter 5.7), it is only applicable to such users whom they have access to. This will usually not be people with a communicative disability, nor is it straightforward for administrative professionals to conduct 6–9 interviews with people with disabilities for each text that they write. Access to groups of people with communicative disabilities – this would be a precondition to conduct the interviews – is not particularly easy. The ability to adequately conduct such an interview with people with communicative disabilities is not part of the regular job description of federal agency or administration staff. That means, if such texts are extended to people with disabilities they will mostly not be backed up with interviews or real contact with the user groups, but build on assumptions on how the texts should be created in order to be accessible. This is not the original concept of Plain Language, which is profoundly user-centred and relies on direct experience with the clients.

The manuals show that Plain Language as a concept is adjustable to the needs of the audience; to do so requires a firm knowledge of these needs. If this knowledge does not exist and decisions are based on guesses, a style guide that gives suggestions of the type ‘know your readers and you will know what means to choose’ is not sufficient for a sound and helpful text practice. What is more, in the age of online communication, few texts are specifically addressed to a concrete group with clearly distinguishable needs.

At the same time, there are demands from the empowerment movements of the disabled to offer their members and clients Plain Language texts for communicative participation (see for ex. the demands in the UN-CRPD as laid out in Chapter 2.3.1). It is apparent that people with communication impairments may need communication offers that are far more comprehensible and perceptible than the variety and reading level described in the Plain Language guides. Cutts (2013) sets the span of possible users between “supposed reading age 13” and “an audience of scientists” (see above); this requires firm knowledge of the needs of the users to whom a specific text is addressed.

4.3 A typical example: A Plain English Handbook (1998)

In 1998/1999, the Office of Investor Education and Assistance of the SEC issued a handbook on Plain Language (available online under www.sec.gov/news/extra/handbook.htm). It is an example of an influential as well as typical Plain Language manual. In the handbook, the authors explain what Plain English means (Chapter 1). They point out that Plain Language texts have to be audience-centred (Chapter 3):

“Knowing your audience is the most important step in assuring that your document is understandable to your current or prospective investors. To write understandable documents, you need to gauge the financial sophistication of your investors.” (Office of Investor Education and Assistance: A Plain English Handbook 1998: 9)

As a source of this information, they refer to market survey research tools or to “investor relations staff or their underwriters to describe who has bought, or is likely to buy, their securities” (ibid.). They suggest finding answers to the following questions that are seen as crucial for the choices of linguistic means and textual strategies:

- “What are their demographics – age, income, level of education, and job experience?
- How familiar are they with investments and financial terminology?
- What investment concepts can you safely assume they understand?
- How will they read the document for the first time? Will they read it straight through or skip around to the sections that interest them?
- Will they read your document and your competitors’ side by side?
- How will they use the document while they own the security? What information will they be looking for later, and is it easy to find?” (ibid.)

It becomes apparent that this handbook, just like the other Plain Language manuals, does not address an audience with communication impairments. The audience are presumed laypeople regarding the text subject. Plain Language is conceived, as is typical, as target group-oriented. What is interesting is that not only the sociological perspective (age, income, education) is taken into consid-

eration, but also the target situation: the way they will probably be reading the text, the possibility of other (competing) texts on the same subject being part of the situation etc.

Again, there are no fixed rules but flexible principles that are aligned with the conditions and needs of the target audience in the target situation. This is, as I have shown, a typical approach for Plain Language, as opposed to the clear-cut rule set of Easy Language.

In Chapter 6, the handbook then goes into detail identifying “common problems” (“long sentences”, “passive voice”, “weak verbs”, “superfluous words”, “legal and financial jargon”, “numerous defined terms”, “abstract words”, “unnecessary details” and “unreadable design and layout”) and providing solutions on how to fix those problems. Plain Language is described as follows:

“The plain English rewrite uses everyday words, short sentences, active voice, regular print, and personal pronouns that speak directly to the reader.” (Office of Investor Education and Assistance: A Plain English Handbook 1998: 18)

The concrete regulations go in a similar direction as the practical guidelines for Easy Language:

- “Use the active voice with strong verbs” (19), a rule that is part of all Easy Language guidebooks.
- “Try personal pronouns” (22) in the sense of personally addressing the audience, also part of Easy Language.
- “Bring abstractions down to earth” (23): the same is true for Easy Language.
- “Omit superfluous words” (25), meant here for connectors like “subsequent to” or “in the event that” to be replaced by “after” or “if” respectively; this is rather a question of administrative written style than of word count. In this concrete example, Easy Language would follow the same rule. If the same amount of information has to be conveyed, Easy Language texts will usually be longer than the original (see Chapter 3.3.5)
- “Write in the ‘positive’” (26) which is reflected in the ban on negation in Easy Language guidebooks.
- “Use short sentences” (28) and “Replace jargon and legalese with short, common words” (30)

- “Choose the simpler synonym” (31) (for criteria how to decide which one is the simpler synonym see Chapter 3.3.3)
- “Keep the subject, verb, and object close together” (32), clearly a requirement directed toward the attention span of readers.
- “Write using ‘if-then’ conditionals” (33). In Easy Language there are no compound clauses instead and thus no “if-then” conditionals. We have an indication here to a sentence complexity for Plain Language that is above Easy Language.
- “Keep your sentence structure parallel” (34); repetitive structures that reach a high level of activation in the readers’ minds are a tool in Easy Language as well.

Chapter 7 is dedicated to questions of design outlining basics of text layout.

Just like the other Plain Language manuals, but also the practical Easy Language guidelines, the handbook suggests evaluating the “document by testing it with a focus group” highlighting that “focus groups require time and money” (Office of Investor Education and Assistance: A Plain English Handbook 1998: 59) and using readability formula and style checkers for electronic monitoring.

4.4 Citizen-oriented Language (“Bürgernahe Sprache”) in Germany

“Einfache Sprache” as the German Plain Language equivalent is rather new. The term “Citizen-oriented Language” (“Bürgernahe Sprache”, literally “language that is close to the citizens”), on the other hand, has been a recurring feature in Germany in scientific and administrative publications since the early 1980s (Schubert 2013) and is related to (although not identical with) the Plain Language concept as presented in the previous sections. It is very close to the “lenguaje claro” concept defined by Pedraza Pedraza (2019) as “transparent and horizontal communication between institutions (public administration and companies) and citizens” (“comunicación entre instituciones (Administración Pública y compañías) y ciudadanía”, Pedraza Pedraza 2019: 107). Heckmann (1981) formulated a “plea for citizen-oriented language of law-making”. That the language he called for was not Easy but Plain Language becomes clear in his distinction between “incomprehensible” and “hard to understand” (*unverständlich* vs. *schwerverständlich*; Heckmann 1981: 13), the latter being justified and necessary in expert contexts like legal communication. One of the

first practical publications on the topic were the influential guidelines by the Federal Office of Administration (Bundesverwaltungsamt) issued in 1984 under the title “Citizen-oriented administrative language” (“Bürgernahe Verwaltungssprache”, Bundesverwaltungsamt 1984). In total, 200,000 copies of this material were distributed before it was elaborated into a working manual that was last updated in 2002 and disseminated via the Internet (Bundesverwaltungsamt ⁴2002).

“The goal of the Working Manual ‘Citizen-oriented administrative language’ is to foster mutual understanding and cooperation between authorities and private citizens. Each administrative decision or other notification has, in language, content und reasoning, to be designed in a way that citizens are able to understand and accept. Letters from the administration are like a calling card for public administration. A language unintelligible to the citizens loses its meaning. Therefore, administrative language must not be a secret language only intelligible to insiders. A suitable language has to build up a trust-based relationship; it is a bridge between the people inside and outside of an administration. In this manner, communication barriers can be overcome and difficulties in understanding can be avoided.” (Bundesverwaltungsamt ⁴2002: 6, my translation).

The working manual addresses administration staff and points out to them how important it is to communicate appropriately with the citizens. The underlying goal is twofold: to inform citizens in a way that they understand and to make them respond and comply. The means to reach this goal are also twofold: the manual distinguishes between measures of comprehensibility for and of proximity to the citizen (of course it could be argued whether gaining proximity to the citizens could also be seen as a goal of its own). Measures of the first type comprise the strategies commonly known like to following (my translation):

- Word level:
 - Use common words
 - Use unambiguous words
 - Prefer short words
 - Do not endanger comprehensibility by using abbreviations or foreign words

- Use the same terms for the same contents
- Do not use noun chains
- Do not replace verbs with nouns
- Sentence level:
 - Prefer a clear sentence structure
 - Find the appropriate number of words per sentence
 - Do not nest too many sentences
 - Consider the relation between message and sentence structure
- Text level:
 - Mind the internal structure
 - Reason consistently and coherently
 - The structure of your text should follow its function and content
 - Mind the individual case even if you use preformulated text modules
 - Try to visualize abstract matters with the help of examples
 - Stick to the essential
 - Is your text comprehensible without additional explanations?

Some more advice for increased comprehensibility is given:

- Adapt explanations and justifications to the level of knowledge of the addressed persons
- Cite important regulations literally
- Explain regulations that are hard to understand – but be careful with “translations”

Especially the last three are instructive in terms of the envisaged language level:

There are no provisions in the manual for how the administrative experts should transform the information to the expected level of knowledge (or mastery of language). Unlike the Plain Language concept, no mention is made of focus group tests, of readability formulas or style checkers. The question of appropriateness or adequacy is entirely left to the administration experts. But being experts and familiar with the expert language that they use does not mean that they are necessarily able to disentangle from their position in a way that makes their writing truly accessible to non-experts.

The advice to cite important regulations literally points to an overall comprehensibility level of the text that is far beyond the usual Plain Language ap-

proach: Citizen-oriented administrative language is by no means oriented toward a reading age of 13 (see above my remarks on Cutts 2013) but rather addresses the educated classes who are not administration experts.

Citizen-oriented administrative language is not comprehensible to the point to put justiciability at risk. If a choice must be made between explaining a decision or to keep up the fence, the position of the manual is very clear:

“Caution: Even if it is often recommended, it is dangerous to ‘translate’ or transcribe administrative expert language into everyday language. The greatest of caution is needed here! The content of a difficult expert text with its fine-grained gradations and references to the legal system is so highly delicate that it can be changed and even distorted by any ‘simplification.’” (Bundesverwaltungsamt ⁴2002: 36, my translation)

This call for caution leaves next to no room for comprehensibility work and leaves all the responsibility with the administration staff.

Measures of the second type are intended to ease the feeling of asymmetry in communication:

- Signal proximity to the citizen:
 - Be approachable, friendly and sympathetic
 - Exhibit your effort for mutual understanding
 - Replace orders with solicitations
 - Avoid red tape
 - Replace passive voice with active forms
 - Reason in a way that builds trust
 - Pay attention to correct spelling
 - Chose personal address, if possible, also in the text
 - Citizens want to know who they are dealing with: sign with your name
 - Pay attention to gender-sensitive language
 - Get the names right
- Enhance compliance:
 - Indicate where to find further information
 - Provide information on the following procedures
 - Answer quickly if citizens write you letters
 - Adjust to the person you are addressing

The manual reported here is typical, other manuals are quite similar, see for example the manual issued by the Bavarian Ministry of the Interior (Bayerisches Staatsministerium des Inneren 2008). German Citizen-oriented language aspires not so much to general comprehensibility, but rather to adequacy in address. It does not address people with communication impairments, it does in fact not even address the average population, but rather the educated class. It aims to explain administrative decisions in the framework of legal regulations and to make them transparent for those who can understand. As Plain Language is a flexible concept, German Citizen-oriented language might well be situated in the upper complexity region of Plain Language were it not for the total lack of reader perspective in the manuals (that is: user tests are not a component of those manuals). Plain Language usually departs from a user perspective and is sensitive to the diverse needs of different groups of people and to the strong asymmetry in expert-lay communication; Citizen-oriented language paradoxically does not and is not. There are first reception studies that present information on which features are helpful and which are not (see Wolfer 2017; Wolfer et al.).

4.5 Plain Language approaches in Germany

The Plain Language equivalent in Germany is usually called “Einfache Sprache” (for terminology, see Chapter 2.2; for what follows also see Bredel/Maaß 2016a: 526ff). Unlike Easy Language that has distinct features and can thus be codified, Plain Language is a dynamic variety that adapts to the needs of specific user groups in special target situations. Therefore, it cannot be codified with a fixed set of rules, but needs a dynamic system to gradually disburden or enrich. Such a system will be proposed in 4.6.

Plain Language is used in the context of providing adequate offers for non-expert or weak readers: Readers that have problems reading standard texts often avoid reading and writing (Grotlüschen/Riekmann 2011: 2). They need text input that is tailored to their needs. Wagner (2015) proposes a model for Plain Language in the context of her approach to make exams accessible for students with communication impairments, for example, prelingual hearing impairments (see Wagner/Schlenker-Schulte 2006). In this concrete case, the linguistic complexity has to be dosed according to the students’ needs, but the complexity level of the content that is the subject of the exam must not be

reduced. Wagner (2015) conceptualises the relation between Easy and Plain as follows:

	Easy Language	Plain Language
Linguistic reduction	+	+
Content reduction	+	–

Table 10: Easy, Plain and standard Language according to Wagner (2015)

In Wagner's (2015) approach, content reduction is an integral part of Easy Language, but not of Plain Language. Other approaches do not share this idea. In Bredel/Maaß (2016a, b), we conceptualise Easy Language as a variety of German with formally describable features, not as a text quality (Bredel/Maaß 2016a: 527). A text in Easy Language has distinguishable linguistic qualities that are independent of the degree of content reduction. Content reduction is dependent on the complexity and size of the source text and the intended target situation. The same is true for Easy Language, that may also manifest content reduction if the target situation so requires.

So, on the one hand, there are Easy and Plain Language, varieties that are used to adapt information to the needs of users. And, on the other hand, there is a translation practice that works to dismantle communication barriers using, for example, Easy and Plain Language and other strategies to optimise perceptibility, comprehensibility, and acceptability. In this translation practice, according to Rink (2020) and Maaß/Rink (2020), translators strive for scenario C:

- Scenario A: the Easy Language text contains the same information as the source text, but is excessively long
- Scenario B: the Easy Language text is short enough for the users to process, but is trivial and does not contain enough information to form solid concepts on the subject
- Scenario C: the Easy Language text is retrievable, perceptible, comprehensible, linkable, acceptable and action-enabling. (Rink 2020: 99f; for more details on the scenario approach, see Chapter 3.3.5 above)

Scenario C describes the intended aim of Easy (or Plain) Language *translation*. Easy and Plain Language have linguistic qualities that can be harnessed to produce texts that are adequate for users with different needs. The question is

whether Plain Language is distinct enough to describe its features. For a proposal, see Chapter 4.6.

In the English-speaking world, Plain Language is defined via a user-centred approach. Such an approach is currently missing in Germany, where the proposals are, in terms of Cheek (2010: 6) rather “elements-focussed”, that is, focussed on generic style advice rather than on users. In Bredel/Maaß (2016a: 532), we propose to refer to empirically determined competence levels (see below); on an international scale, we have the PIAAC (2013) and PISA (2002) surveys that define and describe literacy levels. What is also helpful are the findings of comprehensibility research that has delivered extensive insights on what makes a text easy or difficult to understand (for an application to Easy Language, see Bredel/Maaß 2016a: 117ff). Additionally, there is research on language or reading acquisition on the one side and language decay on the other side: vocabulary or grammatical structures that are learnt early in life (see for example, Bryant 2006; Bredel/Maaß 2016a: 302ff; 345ff) and unlearned late (see for example, Schecker 2003, Gress-Heister 2003), are more basic and thus better suited for comprehensibility enhanced varieties than what is acquired later in life and more easily forgotten. Nonetheless, research with the different target groups needs to be conducted; the fundamental study of Guter-muth (2020) makes a first effort to research the difference of Easy and Plain Language with four different target groups, among them also primary target groups of Easy Language.

Plain Language can also be defined in terms of the consequences that reduction strategies have on the target texts: While Easy Language will use every possibility to maximally enhance comprehensibility even at the cost of acceptability or language economy, Plain Language has a broader margin. To renounce pronominal anaphora has serious consequences on the text level; to avoid the subjunctive mood requires elaborate explications; to reduce the case system of a language leads to laborious paraphrases and reduces acceptability (as do the other measures). Word explanations and term definitions often hamper the text flow. So the decision which strategies to admit in a Plain Language text can be made dependent on what consequences an author or translator wishes to avoid or which strategies yield the most benefit for the target texts (Bredel/Maaß 2016a: 532).

At the moment, the opportunities of Plain Language remain largely unexploited in Germany. There are some proposals and drafts, but there is, at the moment and differently from Easy Language, no dominating approach and no stable market for translations.

Baumert (2018) published the only comprehensive monograph on Plain Language for German. But though he targets the needs of non-expert readers – excluding people with disabilities and explicitly (but strangely) also migrants/learners of German as a second language –, the advice he gives is rather generic and does not exceed the average writing style guide. To follow his advice will generally improve the average text practice but it remains unclear to what extent that which he describes can be classified as Plain Language at all. He does not address the reader perspective and departs from the Plain English practice of evaluation by the target groups; he also does not include empirical validation of any kind.

Neubauer (2019) expressly addresses migrants/learners of German as a second language, but his approach remains superficial; it is in fact limited to the following 11 rules:

1. Use familiar words.
2. Use precise and concrete words.
3. Use short words.
4. Avoid filler words.
5. Avoid abbreviations.
6. Form short sentences.
7. Use verbal style.
8. Use the active voice.
9. Form a maximum of two subordinate clauses.
10. Use the Genitive sparingly.
11. Use language “economically” (That is: no superfluous information).

Neubauer (2019) claims to have built his approach on a scientific basis and together with the target groups, but does not refer to any literature nor explain in what way the target groups were included in the project.

A rather elaborated approach is delivered by de Oliveira who is the author of two guidebooks on accessible online communication (de Oliveira 2013, 2018) and provides abundant information on accessible online communication on his web platform netz-barrierefrei.de. This information comprises detailed explanations on Plain Language. For de Oliveira, Plain Language addresses the “general population”, that is people that can read but might have little reading practice and are “principally able to extract complex information from texts” (www.netz-barrierefrei.de/wordpress/einfache-sprache/regeln-fuer-einfache-sprache/, my translation). According to de Oliveira, Plain Language is “gener-

ally not suitable for people with cognitive disabilities, for people with poor language skills or functional illiterates” (ibid., my translation). The guidelines he displays correspond roughly to those in the previously cited manuals, even if, in quantity and elaboration, they by far exceed the rule set of Neubauer (2019). De Oliveira includes at least an abstract and intuitive form of user perspective in his approach (s.a.; my translation):

“It is important to adapt the text to the minimum standard of a target group. If you speak about digitalisation and want to address senior citizens, you should not use terms like digital infrastructure, broadband connection or artificial intelligence without explaining them.”

This implies that if the intended users are not senior citizens it would be possible to write a text that includes terms like “broadband connection” without explanation and still call it a text in Plain Language.

However, de Oliveira’s approach is not very coherent. When elaborating on the lexical dimension of Plain Language, for example, he states: “Plain Language vocabulary comprises more or less 2400 different words” (my translation) referring to the B1 word list of the Goethe Institute. Now, it is virtually impossible to manage with just the 2400 lexical items of basic vocabulary even in the context of Easy Language as this is far too small a ground with which to write texts on every aspect of human life, as is expected for Easy and Plain Language. As Beckers (2014) has shown, it is highly questionable whether word frequency lists of any kind are an appropriate means to delimit or control the vocabulary for Easy Language (see my remarks on this in Chapter 3.3.3). Of course, de Oliveira allows for explanations in the text (my translation):

“You may use words that are not part of the basic vocabulary. You will then have to reflect on how well-known the respective word is. If you cannot assume that the word is known, you have to explain it.”

But no scale is given that could indicate which words can or cannot be assumed to be known.

No indications are made in terms of how to understand what the addressed users will or will not comprehend. Like in the approaches of Baumert (2018) and Neubauer (2019), no direct contact to the users is required in de Oliveira’s approach. It is the authors who decide what they deem appropriate for their intended users. As de Oliveira’s approach is mainly about (open-access) online

communication, limiting the text reception to users with a concrete profile (for example, senior citizens) is, in any case, not very probable.

Another theoretical rather than practical approach to Plain Language is Gutermuth/Hansen-Schirra (2018) and Gutermuth (2020): The authors describe Plain Language on the basis of Halliday's grammatical metaphor concept. Plain Language is conceived as a continuum of rendering the same meaning with linguistic material of differing complexity. This model is directed toward linguistic analysis and does not strive to model the variety for practical application.

4.6 Strategically dosing comprehensibility: Plain Language as a “chest of drawers”

Differently from Easy Language, Plain Language does not have a fixed set of rules that produces a predictable outcome on the text level. Instead, Plain Language varies greatly depending on the presumed reading skills of the intended audience. As we have seen, it is difficult to predict these skills; they may diverge greatly from one individual to another, they may be unknown to the text author or there might be a multitude of different users as in online communication.

One possibility to anticipate the reading skills of the intended audience is to refer to empirically established levels of reading competence. There are, for example, the following models:

- The Common European Framework of Reference for Languages (CEFR) for learners of foreign languages. If texts are intended for language learners, they can be designed according to the description of the grammatical and lexical levels for the different stages ranging from A1 to C2.
- The skills levels for students as described within the PISA research programme (Programme for International Student Assessment); since 2000, this research programme has measured the scholastic performance of 15-year-old students in mathematics, science and reading with the intent to evaluate the educational systems of most OECD member states and a number of partner states.
- The skills levels for adults as described within the PIAAC research programme (Programme for the International Assessment of Adult Competencies).

In the following, I refer to the PISA programme which is the most commonly known of the three. The lowest reading level 1b in the PISA programme is described as follows:

“Tasks at Level 1b require the student to retrieve a single piece of explicitly stated information in a prominent position in a short, syntactically simple text with a familiar context and text type, such as a narrative or a simple list. The text typically provides support to the student, such as repetition of information, pictures or familiar symbols. There is minimal competing information. In tasks requiring interpretation, the student may need to make simple connections between adjacent pieces of information.” (OECD 2014: 196)

These criteria refer to texts with an extremely simple and accessible language and information structure that are clearly below the level of Plain Language texts. Readers who do not exceed PISA Level 1b will need Easy and not Plain Language. Level two is described as follows:

“At level 2, some tasks require the reader to locate one or more pieces of information, which may need to be inferred and may need to meet several conditions. Others require recognizing the main idea in a text, understanding relationships, or construing meaning within a limited part of the text when the information is not prominent and the reader must make low level inferences. Tasks at this level may involve comparisons or contrasts based on a single feature in the text. Typical reflective tasks at this level require readers to make a comparison or several connections between the text and outside knowledge, by drawing on personal experience and attitudes.” (OECD 2014: 191)

Again, the description is mainly about the way information is presented and embedded; this, of course, also relates to vocabulary and syntactic structure as they have to sustain the simple information structure. In total, 82% of the students were able to perform at level 2, while only 57.6% achieved the following level 3 (ibid.):

“At level 3, tasks require the reader to locate, and in some cases recognize the relationship between, several pieces of information that must meet multiple conditions. Interpretative tasks at this level require the

reader to integrate several parts of a text in order to identify a main idea, understand a relationship, or construe the meaning of a word or phrase. They need to take into account many features in comparing, contrasting or categorizing. Often the required information is not prominent or there is much competing information; or there are other text obstacles, such as ideas that are contrary to expectation or negatively worded. Reflective tasks at this level may require connections, comparisons, and explanations, or they may require the reader to evaluate a feature of the text. Some reflective tasks require readers to demonstrate a fine understanding of the text in relation to familiar, everyday knowledge. Other tasks do not require detailed text comprehension but require the reader to draw on less common knowledge.”

Level 3 excludes almost half of all users in the study. Although Plain Language is a flexible concept, it would not achieve its self-imposed purpose if it chose a form that excluded so many users. Thus it seems plausible to situate Plain Language at PISA Level 2 and pay attention to information structure as well as grammatical and lexical features that hinder or facilitate access to information. This is in contrast to Wagner’s (2015) and Wagner/Schlenker-Schulte’s (2006) approach that links only Easy Language to conceptual simplification whereas only language and not information structures are simplified for Plain Language: The extent of necessary simplification strategies is surely different for Easy and Plain Language, but successful Plain Language models will always have to take into account all aspects of language and text, including information structure.

On a general note, we are on a solid ground regarding the strategies to be used in Plain Language. But in order to make predictions as to which precise linguistic categories are tolerated for Level 2, we will need thorough empirical research with the intended target groups. This research is developing at the moment with the work of Gutermuth (2020) already available and several empirical research projects at the universities of Mainz/Germersheim and Hildesheim underway (see the contributions in Hansen-Schirra/Maaß 2020b).

In the variety system of a natural language, Plain Language is situated between the expert language on the one side and Easy Language on the other side:

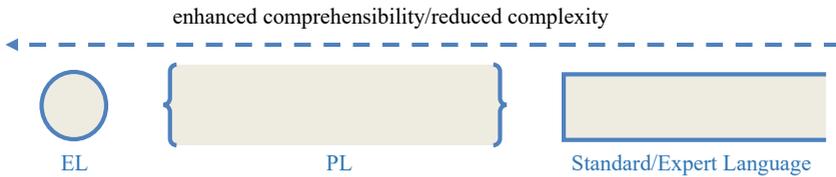


Figure 17: Easy Language – Plain Language – Standard Language – Expert Language

This means it can be approached either from the expert language or the Easy Language side. It can either be described ...

- ... as a reduction with respect to expert language or
- ... as an elaboration with respect to Easy Language

In very much the same way, Plain Language strategies can be described in terms of ...

- ... avoiding certain grammatical and/or lexical features that are considered too difficult for the Plain Language audience or
- ... adding certain grammatical and/or lexical features that are banned from Easy Language but can be processed by the Plain Language audience.

Easy Language is achieved through a procedure of reducing the standard linguistic inventory to a core of everyday vocabulary and basic grammatical features. At the same time, gaps in global and discourse knowledge will have to be filled through procedures of addition, for example of explications, resolution of implicatures or exemplifications.

Plain Language can thus be conceptualised as a strategic enriching procedure on the basis of the Easy Language rule set. The addition procedures can also be downsized as Plain Language users will have more global and discourse knowledge at their disposal.

Easy Language is a static system that excludes entire categories of grammatical features like compound sentences, the subjunctive or third person anaphoric pronouns. To eliminate as many potential difficulties as possible from the system of a linguistic variety makes it maximally comprehensible. As a result, Easy Language is intended to be the maximally comprehensible variety of natural languages.

But these features that are eliminated from Easy Language, still remain challenges for readers even if they can cope with slightly more elaborate texts. In Bredel/Maaß (2016a, b), we state that lexical and grammatical complexity

adds up and must not, in its entirety, surpass the comprehension level comfortably managed by users. This corresponds to Gutermuth's (2020) Kapa-BK model of overall comprehension capacity in accessible communication. Both approaches are backed by comprehensibility research as summarized in Christmann/Groebe (2019).

The complexity level that Plain Language users will tolerate lies above the complexity level processed by Easy Language users. On these grounds, in Bredel/Maaß (2016 a, b) we propose a conceptualisation of Plain Language, departing from the maximum reduction level of Easy Language and enriching it according to the respective text purpose.

We conceive Plain Language as a chest of drawers, where the upper line of drawers contains all the linguistic means that are allowed in Easy Language:

“The top drawers contain the linguistic means that are also suitable for Easy Language. The lower you get, the more complex it becomes. The model is made for criteria-based enhancements of text complexity: If you pick the lower drawers in one category, that is, if you increase language complexity in this category, you should preferably pick the top drawers in the other categories.” (Bredel/Maaß 2016b: 187, my translation).

The goal is not to increase text complexity beyond a certain limit as recipient resources are limited (Gutermuth 2020).

Syntax	Negation	3 rd Person Pronouns	Lexicon
☼ Main clauses only	☼ <i>no, not</i>	☼ no 3 rd person pronouns	☼ central representatives only
☼ Compound sentences	☼ <i>nowhere, never</i>	☼ unambiguous resolution	☼ basic vocabulary and foreign words
☼ Nominalisations	☼ <i>expressly precluded, inapplicable</i>	☼ complex resolution procedures	☼ additionally technical terms



Table 11: Bredel/Maaß (2016b: 187, my translation).
In the direction of the arrow: increasing complexity

That is, the more you bend down and reach for lower drawers, the more difficult the inventory will be. This approach allows writers to dose the complexity

of their texts along firm criteria, keeping in mind the overall complexity of their text and balancing them with the presumed capacity of the intended users. If the author of a text decides to open lower drawers in the lexicon row, he or she will have to stick to the upper drawers as far as the syntax row is concerned.

In the Plain Language chest of drawers, there are rows for all grammatical, lexical, and textual features that are known to be cumbersome for weak readers:

- Lexicon: use of central and peripheral vocabulary, foreign words and terms
- Syntax: main or compound clauses, nominal style etc.
- Grammatical features like tempus, mood, aspect, case
- Semantic features like talking about past, fictional, potential or contrafactual events (negation is part of this, Bredel/Maaß 2016a: 431ff)
- Pragmatic features like address and politeness in its different forms, indirect speech acts, tropes
- Textual features like information structure, implicatures, presupposed knowledge etc.

On the basis of the research (an overview in Bredel/Maaß 2016a), we have well-founded assumptions as to how the drawer rows are structured in terms of comprehensibility. These assumptions will of course have to be verified in empirical research projects with the target groups. Here are some examples for drawer rows in the Plain Language chest of drawers (Bredel/Maaß 2016b: 190ff):

Syntax:

Syntax
 1) Main clauses only
 2) Compound sentences
 3) Nominalisations



Table 12: Bredel/Maaß (2016b: 190, my translation).
 In the direction of the arrow: increasing complexity

- Simple main clauses without subordinate clauses are the easiest to process: *Perhaps it will rain. Therefore, we will take an umbrella with us.*
- Compound sentences are more difficult to process: *As it might rain, we will take an umbrella with us.*
- The most difficult are complex nominal structures: *Considering the possibility of rain, we made the decision to take an umbrella with us.*

A text consisting exclusively of main clauses with no compound sentences at all has enhanced syntactic comprehensibility, but is stylistically displeasing. This is a burden for Easy Language and puts its acceptability in danger. For Plain Language, compound sentences are admitted; complex nominal structures should nevertheless be avoided as the information is embedded too deeply and they require global and grammatical knowledge to be resolved.

Pronouns:

3 rd Person pronouns
☼ 1) No third person pronouns
☼ 2) Pronouns with unambiguous anchor
☼ 3) Pronouns with more than one possible anchor
☼ 4) Pronouns considerably distant from their anchor
☼ 5) Pronouns with ambiguous anchor



Table 13: Bredel/Maaß (2016b: 192, my translation).
In the direction of the arrow: increasing complexity

Third person pronouns pose a problem for weak readers. They are important for the text flow but resolving them requires grammar, discourse and background knowledge. Therefore, they are banned in Easy Language (see Chapter 3.3). In Plain Language they are gradually readmitted, depending on how easy they are to be resolved. This depends on how easy it is to link them to their antecedent or anchor:

1. No 3rd person pronouns: *Mary has a son. The son of Mary is three years old.*

In this case, no resolution is required. This is the Easy Language version that is most comprehensible but, on the downside, less acceptable as it reduces variance and is also detrimental to cohesion.

2. Pronouns with an unambiguous anchor: *Mary has a son. He is three years old.*

In this case, there is only one possibility of anaphora resolution and the anaphoric pronoun is placed close to its anchor. The reader will have to know that sons are masculine. This will not pose a problem in the present case, but might in others, especially when instead of persons, abstract nouns are involved: in German, readers will have to know that *Strategie* (“strategy”) is feminine, whereas *Ansatz* (“approach”) is masculine and *Modell* (“model”) is neuter, in order to find the right anchor for an anaphoric pronoun. When persons are designated, there might be a contrast between grammatical and social gender or sex (for example *Mädchen* “girl” is neuter in German).

3. Pronouns with more than one possible anchor: *Peter has a son. He is three years old.*

The pronoun *he* may refer to *Peter* as well as to *son*. Some knowledge is required (in the present case: that fathers have to be older than their sons and, in any case, older than three years of age) in order to conclude which the right anchor is for the anaphoric pronoun. In this specific case, this knowledge is of course to be expected from potential text users, but, again, the necessity of drawing inferences enhances the overall complexity of a text and deduces from its comprehensibility.

4. Pronouns that are considerably distant from their anchor: *Peter has a daughter. Before becoming a father, he had been traveling the world not thinking about tomorrow. She is now three years old.*

The resolution of the anaphoric pronoun requires the reader to maintain focus and recall the information given. Some of the Easy Language target groups have a reduced attention span; to present information to them like in the ex-

ample would endanger their comprehension. For Plain Language users, this might work, but it still strains their comprehension resource.

5. Pronouns with an ambiguous anchor: *Peter has a son. He is 30 years old.*

The latter case obviously poses a grave danger to comprehension and should not only be avoided for Plain Language but for text production in general, if it is not used strategically. The other three slightly more complex forms (examples 2 through 4) belong to the instrumentarium of Plain Language. Authors will have to bear in mind that they do increase the complexity level of their text and thus strain the comprehension resource to a greater extent than the first one. The first example is typical for Easy Language, but should also be considered for Plain Language if the overall complexity of a text is already high, due to choices concerning language and information structure.

Impersonal constructions:

Impersonal constructions
 1) No impersonal constructions
 2) General statements only
 3) Impersonal constructions with implicit actors



Table 14: Bredel/Maaß (2016b: 193, my translation).
 In the direction of the arrow: increasing complexity

Impersonal constructions are frequent in texts. They are used if a statement is generally true for everybody (*Eating chocolate will make you happy* in the sense of *will make anybody happy*). They are also used in institutional communication if a case-worker does not speak for him- or herself, but is issuing information or requests in the name of the whole institution. This use of impersonal construction bears the risk that the readers will not understand ...

- ... who is addressing them,
- ... whom they can turn to,
- ... what exactly they will have to do.

They might feel intimidated and might not understand what their rights are. Impersonal constructions are a risk to comprehension and also to face (in the sense of the linguistic face theory, see Goffman 1967, Brown-Levinson 1987). Thus, these structures are critically dealt with ...

- ... in Easy Language rule sets,
- ... in recommendations for Plain Language,
- ... and even in the manuals of Citizen-oriented Language.

There is a difference though between general statements (*Everyone should care for their neighbours.*) and impersonal constructions with implicit actors (*You will be informed in due time.* > Who gives the information?). While general statements may well be admitted into the Plain Language toolkit, impersonal constructions may pose a problem for Plain Language users and will find their place only in such Plain Language texts that are fairly close to the standard.

To implement the model of Bredel/Maaß (2016a, b) for Plain Language means to strategically choose from the drawers: Not all the bottom drawers may be opened at the same time as this would adversely affect comprehensibility. The question whether lower drawers might be opened at all for a certain text depends on the intended audience: Can they be expected to cope with the structures from a bottom drawer? This might be the case if the text is addressed to a clear-cut group that meets the necessary requirements. If this is not the case or remains unclear, authors are better off sticking to the upper or medium drawers.

For example, technical terms without explanations can be used in a Plain Language exam text for students with communication impairments. In an exam, students are required to demonstrate their knowledge on terms. In this case, it makes perfect sense to open the bottom lexicon drawer. But by doing so, to remain within the concept of Plain Language, would require the author to keep the lower drawers shut for the other categories. For syntax and semantics, for example, they would have to stick to the upper drawers in order to not overstrain the capacity of the users: Sentences should be kept short with no sub-clauses, negation should be kept simple and possibly be highlighted, etc.

If, on the other hand, the subject of the text is commonplace and well-known to the users and the vocabulary is correspondingly simple and down-to-earth, Plain Language users will tolerate more complexity in other categories, like syntax. The overall complexity of the Plain Language text will then remain within the borders of their comprehension capacity.

The Easy Language Plus model developed in Chapter 7 relies on Bredel/Maaß' (2016a, b) chest-of-drawers approach. It systematically takes into account how the individual features influence, inter alia, comprehensibility and acceptability and allows for a strategic balance of these criteria.

4.7 A short summary on comprehensibility enhanced varieties in the German context

In this chapter, I discussed Plain Language and its (partial) equivalents “Citizen-oriented” Language (Bürgernahe Sprache) and Einfache Sprache. Their relation to Easy Language can be summed up as follows:

	Bürgernahe Sprache (Citizen-oriented Language)	Einfache Sprache (Plain Language)	Leichte Sprache (Easy Language)
Target group	Non-experts with at least average reading skills	Non-experts; people with average or slightly below average language and/or reading skills	Non-experts; people with communication impairments and disabilities
Language level	Complex; close to expert source texts	Reduced complexity to a varying extent with comparison to standard non-expert texts	Maximally reduced complexity
Layout	Identical with source text	Moderately enhanced perceptibility but close to source text	Maximally enhanced perceptibility; layout differs greatly from the source text

Table 15: Citizen-oriented Language, Plain Language, Easy Language

In the German context, Citizen-oriented Language is used in legal and administration communication to address non-experts with otherwise good to excellent language skills in an adequate way. Acceptability rather than comprehensibility is in the focus. “Einfache Sprache” (Plain Language) is a relatively new and unestablished concept. There are legal grounds to extend its use and there are interesting new approaches to implement Plain Language for example in doctor-patient communication and medical information (see for example Schindler 2019).

As of now, there are no established practical guidelines. In Bredel/Maaß (2016a, b), we made a proposal, however, to strategically dose comprehensibility. We modelled Plain Language as a chest of drawers where the top drawers contain linguistic categories suitable for Easy Language with rising levels of complexity the more you go down the line of drawers. I will further expand on this approach in Chapter 7, as it is suitable to model “Easy Language Plus” (EL+), which is intended to be a highly comprehensible variety that is, at the same time, more acceptable than Easy Language.

For Plain Language on the international scale, the main criterion in all the manuals is the target audience. That is, a language is plain if it is adequate for the intended users. According to some of the manuals, the audience may reach from non-experts with formal education to people with communication impairments, as the main criterion is adequacy. In practice, manuals and initiatives are usually directed toward non-expert users with average or slightly below average reading skills. It is mainly used for text types in elaborate code, like legal or administrative and partly medical information. Users with communication impairments are usually not the focus of these efforts.

That users with communication impairments are practically excluded from the Plain Language concept is not a necessity deriving from the concept as such: In theory, Plain Language is a flexible system that is defined by the needs of the respective target audience. It is of course possible to create adequate text offers for people with communication impairments within the framework of Plain Language. The Plain Language that many people with reading difficulties (for example because of a cognitive disability or prelingual hearing loss) will need is simply not the same as the Plain Language that average readers will need in a field they are not an expert in. So the Plain Language concept, if really user-centred, can be used to address any user with or without disabilities and take in consideration their respective communication needs by Plain Language texts of diverse comprehensibility levels.

In practice, the texts produced under the umbrella of the Plain Language concept will usually not be adequate for users with pronounced communication impairments. If trained, administration officers will perhaps be able to produce a text that is comprehensible to an unimpaired audience. But they will mostly not be able to adjust to the enhanced needs of a user with a communication impairment. They will nonetheless believe that they fulfilled their duty as they produced Plain Language (even if not easy enough for the actual needs of their clients). To properly follow the criterion of user adequacy to the extent that it includes people with communication impairments requires highly

trained text experts and extra resources. Plain Language is too broad a concept to achieve this goal and is thus unsuitable for communicative inclusion of people with communication impairments. There are countries (like Norway or Switzerland) that generalise Plain Language for communicative accessibility, especially in legal and administrative contexts. This usually means that people with special communication needs – no matter whether they are due to disability or other reasons (like non-native language skills or functional illiteracy) – will not be tended to sufficiently in a Plain Language-only setting. Plain Language is often so close to the non-comprehensibility enhanced versions that it can hardly be distinguished from purely user-friendly forms of writing or texts following “write for the internet” style guides.

Plain Language is a continuum. This is a chance for comprehensibility-enhanced language, as the stigma of differentness (Goffman 1963; see below, Chapter 6) is reduced if the texts are close to the standard. But Plain Language often merges with the standard to the point of ineffectiveness in terms of the primary goal to enhance comprehensibility. Gutermuth (2020) shows that Plain Language is not comprehensible enough for the primary target groups of Easy Language and that they profit more from the Easy Language versions. The comprehension and recall of all the test groups, including unimpaired readers, in her study was significantly better for the Easy than for Plain Language version of the tested texts. At the same time, the senior citizens in Gutermuth's (2020) study tended to reject Easy Language as unacceptable.

Thus, there are good reasons to stick to the strategy of using both Plain Language in a non-expert setting and Easy Language in the context of communicative inclusion. The issue of acceptability, that has not yet been addressed adequately in the discourse around accessible communication, will be discussed in Chapter 6 with a model for a variety that is more acceptable yet still highly comprehensible in Chapter 7.

5 Easy and Plain Language: Text creators, text users and bystanders

5.1 The different participant roles in accessible communication

This chapter is about the different participant roles in communication processes that involve Easy and Plain Language material.

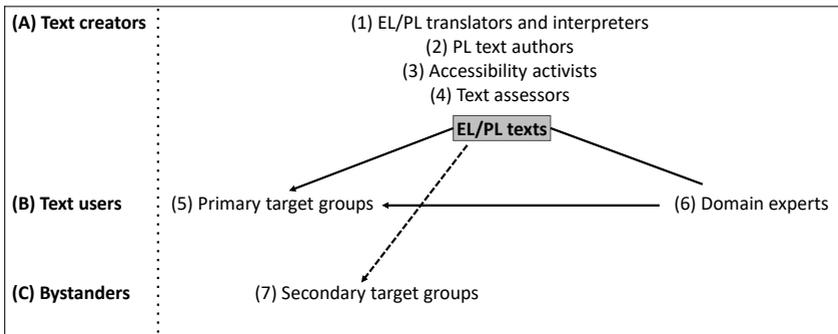


Figure 18: Participants in communication processes involving Easy and Plain Language, modification of Bredel/Maaß 2016a: 139

Easy and Plain Language are instruments of accessible communication: They are used in different kinds of situations to make content comprehensible to users with different profiles. There are three principal role dimensions in Easy and Plain Language communication – and in accessible communication as a whole:

- (A) Text creators
- (B) Text users
- (C) Bystanders

The role scheme as presented in Figure 18 is prototypical, there are different hybrid forms (that is: people engaging in different role dimensions at the same time) that I will expand on in the next chapters.

(A) **Text creators:** Products of accessible communication are produced in three main ways:

... by professionals and experts for accessible communication that transfer existing offers into accessible versions that replace or complement the original or that are drafted as accessible right from the start. Over the last decades, a broad field of specialised accessible communication experts has developed: subtitlers, audio describers, speech-to-text translators, Easy Language translators, Easy Language interpreters etc. They produce texts of very different media realisations and appear in Figure 18 as **Easy and Plain Language translators and interpreters (1)**, the number in brackets referring to the number in the visualisation.

... by domain experts who are urged to produce accessible versions of their expert communication or by any people addressing people with a variety of differing needs. While Easy Language versions are often created by Easy Language specialists, Plain Language texts are often produced by the domain experts themselves; as a result, we focus on **Plain Language text authors (2)**.

... **by accessibility activists (3)** with or without disabilities sharing content that they want to make accessible in order to promote inclusion. They are engaged in projects (like an accessible school homepage or accessibility of a subject domain like religion) or act as private individuals. Some of them or the institutions they work for will be obliged to offer accessible content in the future, as legislation is adapted and more public organisations will have to offer Easy or Plain Language.

There is another prominent role in text production, especially for Easy Language: the role of **text assessors (4)**. Assessors are usually representatives of the primary target groups that are sometimes included in assessment and writing processes of the accessible texts.

(B) **Text users:** The **text user** role is twofold, as users can be:

... persons that need Easy or Plain Language texts (or accessible communication) in order to access content; for them, such texts are a means of participation. These are the **primary target groups (5)**. Among the primary target groups there are people with and without communication disabilities.

... persons that use Easy or Plain Language texts (or accessible communication) in order to communicate with their clients in a professional capacity; for them, such texts are a means of professional communication.

These are the **domain experts (6)**. Domain experts are professionals (like medical staff, teachers or case workers) that use comprehensible texts to communicate with the primary target groups.

(C) **Bystanders: Secondary target groups (7)** can usually access the standard or expert texts and are not directly addressed by Easy or Plain Language texts. They are however confronted with those texts as they are publicly displayed and thus become bystanders of accessible communication. They might choose to use Easy Language texts themselves because they find the original expert texts too hard to understand. If those texts are visibly different from the established standard texts, they will develop attitudes towards those texts that are positive, negative or neutral. They will choose or decline to use such texts themselves. The bystanders have often been underestimated in their importance; the example in Chapter 2.4 shows that they have a considerable impact on the presence of accessible communication products in a society, and even the development of the legal situation.

The following chapters will be dedicated to the individual interacting groups and their roles for Easy and Plain Language and accessible communication as a whole.

5.2 Easy and Plain Language translators and interpreters and other types of text experts

5.2.1 Skills and qualifications of Easy and Plain Language text experts

People in need of accessible communication, here Easy and Plain Language text offers (oral or written), have increased special needs compared to the average text users. The latter are, to a certain degree, able to compensate if texts are too technical, difficult to understand, of poor visibility or otherwise intrinsically unfit for the situation they are designed for. It is at the very core of the concept 'communication impairment' that this ability to compensate is reduced in the primary target groups of Easy Language. Thus, the texts have to comply more closely with the users' needs in order to be accessible. Consequently, text creators and translators/interpreters have to be able to meet at least different requirements. With regard to interlingual translation, the

PACTE group defines a “system of knowledge” that is essential for successful translation and comprises (bi-)lingual, extralinguistic, instrumental and strategic competences, as well as knowledge about translation (PACTE 2003: 16). In the case of Easy Language, the following competences can be identified that are related to the PACTE list (as well as to the requirements listed in other translation competence models like Pöchhacker 2015 or Schulz et al. 2020, the latter with special focus on Easy Language interpreting):

- **Expert domain and expert language competence:** They have to fully understand the source text and its communicative intentions in order to provide target texts that are formally correct and functional. In interlingual translation, translators specialise on certain domains (like legal or medical communication); the Easy Language translation market does not yet have these specialised domains and therefore requires broader domain profiles. As a result, translators will have to rely on domain experts for support to make sure that what they translate is correct.
- **Comprehensive knowledge of Easy Language and its dilemmas:** They have to know the rules related to the different language levels; they have to understand that these rules do not add up, but have a tendency to clash; they have to understand that some of these rules put acceptability at risk. They have to be able to make informed choices on the basis of this situation.
- **Knowledge of the target audience:** They have to really know the target audience and to be able to adapt content to their needs.
- **Competence to assess the target situation:** They have to be able to assess the intended target situation and adapt the target text to the requirements of this situation and the needs of the participants with regard to content and mediality.
- **Translation and text competence:** They have to provide a translation that corresponds to the rules and guidelines of Easy Language that is adequate for the target situation and audience and uses the right means with respect to language style, media realisation and conceptual choices. Respectively, they have to develop and train their interpreting skills including different forms of emergency strategies (Schulz et al. 2020).

Although the points on this list seem intuitive, Easy and Plain Language translation and text creation are very often underestimated in terms of the effort they require as well as the necessary qualities and qualifications of the text creators. This is especially true with respect to expert domain, expert language, text and translation competences, the importance of which is often underrated. This leads to a practice with problematic texts that undermine the public image of Easy Language in particular. Plain Language, on the other hand, is often delegated to the domain experts with the result that the target texts are often not comprehensible enough.

5.2.2 Easy and Plain Language translation and interpreting

Text creation is the term used if the text offer is directly produced in Easy or Plain Language; if the Easy or Plain Language text offer is made on the basis of any form of source text, we speak of “translation”, as a transfer of existing content into another language or language variety has taken place:

“A source text exists or has existed at some point in time. A transfer has taken place and the target text has been derived from the source text (resulting in a new product in another language, genre or medium), i. e. some kind of relevant similarity exists between the source and the target texts. This relationship can take many forms and by no means rests on the concept of equivalence, but rather on the *skopos* of the target text.” (Zethsen 2009: 799f)

To create Easy and Plain Language texts on the basis of existing standards or expert text offers can therefore be considered a translation (see Maaß/Rink 2020, Bredel/Maaß 2016a: 181ff, 2016b: 53ff, Maaß 2019b). Easy and Plain Language translation is covered by Jakobson’s (1959: 233) concept of “intra-lingual translation”. Jakobson distinguishes three forms of translation:

- “1) Intralingual translation or rewording is an interpretation of verbal signs by means of other signs of the same language.
- 2) Interlingual translation or translation proper is an interpretation of verbal signs by means of some other language.
- 3) Intersemiotic translation or transmutation is an interpretation of verbal signs by means of signs of nonverbal sign systems.” (Jakobson 1959: 233)

Audiovisual translation, which has become increasingly developed over the last two decades with intense research activity and a booming multilingual translation market, has founded its identity of being translation on Jakobson's concept of "intersemiotic translation". The concept of Easy and Plain Language translation relies on Jakobson's concept of "intralingual translation" (although there are interlingual forms of Easy and Plain Language translation as well, with Easy and Plain as well as standard texts as source texts). In Bredel/Maaß (2016a) we distinguish various forms of translation along the three main dimensions "sign system", "language system", and "culture":

Sign system	Language system	Culture
Intersemiotic	Interlingual	Intercultural
Intrasemiotic	Intralingual	Intracultural

Table 16: Dimensions of translation (Bredel/Maaß 2016a: 183, modification of Siever 2010: 224, my translation)

Easy Language translation is mostly intralingual; additionally, it can be intersemiotic if the target texts involve sign systems that differ from those of the source text. This is for example the case if imagery or paraverbal information is added or if part of the source text's information is not conveyed by verbal means but by other sign systems. Easy Language translation may also be intercultural if the target audience does not belong to the same culture or discourse communities as the target group of the source text. In such cases, the common ground between the author or text sender and the target audience may be particularly small and cases of non- as well as misunderstanding are frequent (for the concept of common ground, see Clark 1996; for an approach to differentiate between non- and misunderstanding see Kercher 2013). This will require translators to apply strategies to overcome the cultural barrier. In this sense, translation can be conceptualised as overcoming barriers (Rink 2020, Maaß/Rink 2020, Maaß 2019b, and Chapter 1.2); translators are, from this view, experts at identifying and overcoming communication barriers.

Easy Language is not the only form of intralingual and potentially intersemiotic translation: The field of specialised translation and interpreting techniques has diversified considerably in the past years, the most thriving forms belonging to the area of accessible communication:

- Subtitling for the Deaf and Hard of Hearing (SDH) (see Mälzer/Wünsche 2019b),
- Audio description for people with visual impairments (see Benecke 2019),
- Speech-to-text interpreting with or without complexity reduction (see Witzel 2019).

These are the fields where Easy and Plain Language translation and interpreting activity take place. Interpreting techniques are spontaneous forms of text production without premeditation. In the domain of accessible communication, they are typically used in face-to-face communication, for example, in meetings and events or to enable communication between domain experts and clients in different situations. There are different forms, Easy Language interpreting being only one of them:

- **Community interpreting**, in cases where the official language spoken in the situation is not sufficiently understood. Community interpreting has expanded in the last decades as well as research on this topic (see, for ex., Estévez Grossi 2018, Otero Moreno 2019, Ozolins 2010, Mikkelson 1996, Roat et al. 1999, Pöchhacker 1999); in some countries, there is a right to community interpreting in circumscribed situations like police contact or in courtrooms.
- **Sign language interpreting**, for sign language users, is widespread all over the world and exhibits a rich research environment (see, for ex., Schwengber 2019; Benner/Herrmann 2019; de Wit 2016; Bentley et al. 2012; Janzen 2005; Roy 2000; Hauser et al. 2015; Metzger 1999). In Germany, the right to request a sign language interpreter for the exchange with domain experts has expanded in the past years (even if it still largely depends on the deaf person's role in the situation whether they actually have a right to sign language interpreting).
- **Easy Language interpreting**. This form has recently emerged in Germany and has established on the market (Schulz et al. 2020). Easy Language interpreting is used in courtrooms, but also for inclusive events of all forms.
- **Speech-to-text interpreting**, which was already mentioned above, that can be practiced with or without complexity reduction and makes spontaneous oral communication perceptible on a screen (see Witzel 2019).

While community interpreting and sign language interpreting have been consolidated over the past decade, Easy Language interpreting is a rather new technique (also in terms of market development) (Schulz et al. 2020). All in all, we are witnessing a diversification of research activities in this field as well as a booming market looking for specialists, professional translators and media experts. There are also combinations of different audiovisual formats with Easy and Plain Language translation (Maaß/Hernández Garrido 2020, Bernabé Caro/Orero 2019, Bernabé Caro 2020, Perego 2020).

In the case of Easy Language translation and interpreting, professionalisation is still in its infancy, with some countries, especially Northern Europe, being ahead of their time and others following. In Germany, many translators and interpreters on the market are not trained text experts but have strong profiles in working with the target groups (for an example, see Helmle 2017). As I stated above, this is an important, but not the only essential prerequisite for successful Easy Language translation.

5.2.3 Professional profiles and requirements

In some countries, Easy Language translation is mainly dealt with by institutions that are specifically created for that purpose (like the *Selkokeskus* in Finland, see Leskelä 2017). The texts are mostly ordered by public authorities and sometimes by enterprises looking to attract new customer groups or signal that accessibility is part of their mission. In some countries, like Norway, there is government funding for the creation of Easy Language fiction literature that is then performed by authors or literary translators working for the respective publishing houses (Bredel/Maaß 2016a: 67ff). Another widespread text type are news texts that are mostly produced by specially trained journalists who have close contact with the target groups (Heerdegen-Wessel 2019). The texts offered come both in Easy and in Plain Language, depending on the target audience and their presumed needs.

In Germany, a considerable translation market for Easy Language (and, to a much lesser extent, for Plain Language) has developed; other than in some Northern European countries, there is no focus on and no financial support for literary texts. The focus is rather on expert communication in the field of legal and administration matters, politics, news and medical communication. Many other text types, for example of everyday life, culture and education are still mostly lacking (although some of these fields are currently evolving, see, for example, Easy Language in museums as described in Rantamo/Schum 2019; Al Masri-Gutternig/Reitstätter 2017, Carlucci/Seibel 2020). Offers be-

yond written texts that address users in their preferred forms of media realisation are also available only to a very small extent. This is a question of tendering as Germany has passed ambitious legislation and action plans in terms of which text types have to be released first; this is where the efforts are concentrated at the moment. These text types are legal and administrative communication, and, to an increasing extent, medical communication. Political communication is offered by broadcasters and the political parties themselves, mainly in the run-up to elections. Moreover, public broadcasters offer Easy and Plain Language news texts on a regular basis in the framework of their mission to provide information to all users.

In Germany, there are several dozen Easy Language translation agencies, often linked to facilities of people with cognitive impairments, that offer Easy Language translation of standard and expert texts. Numerous professional associations of interpreters and translators have expanded their scope to cover Easy Language translation among their areas of activity, among them the Federal Association of Interpreters and Translators (Bundesverband der Dolmetscher und Übersetzer – BDÜ) with more than 7000 professional members, and the Associated Interpreters and Translators of Northern Germany (Assoziierte Dolmetscher und Übersetzer in Norddeutschland – ADÜ), the biggest professional association of translators and interpreters in Northern Germany. The BDÜ offers a certification programme for professional interlingual translators and interpreters who wish to expand their field of activity to include Easy Language translation. Easy Language has also entered university curricula: There is a master's programme in Accessible Communication including Easy Language translation at the University of Hildesheim. Several other universities have added specialisations in Easy Language translation in the form of individual profiling lectures or modules to their study programmes (for example, at the University of Mainz/Germersheim). In Switzerland, the same is true for the University of Applied Sciences of Winterthur.

In the German speaking area, there are, thus, the following main profiles for Easy Language translators:

- 1) Translators that work in translation agencies linked to facilities for people with cognitive impairments. They have close ties to the empowerment movement. They include people with disabilities in their text creation processes in the role of co-creators and assessors. Some are trained translators, but this is not the main focus of their institutions: many do not have translation competence nor expert domain

knowledge. They provide visibility for the target groups with the goal of active inclusion in the work processes. On the other hand, these translators are not automatically able to achieve correct and functional translations, especially of expert texts. The texts they offer often have an acceptability issue with regard to layout features and imagery as they tend to produce and reproduce texts with a certain visual appearance that are potentially perceived as stigmatising for the target groups. Some also have an acceptability issue with regard to the textual qualities.

- 2) Professional translators from the field of interlingual translation that add Easy Language to their profile by taking certification courses or otherwise adapting to the requirements of Easy Language translation. They usually have excellent expert domain and expert language knowledge, text and translation competence as well as knowledge of the Easy Language rulesets. What is impossible in such certificate programmes is to provide consistent contact with the primary target groups. Some translators will acquire that knowledge outside the certification courses, but this professionalisation route does not ensure that the translators become target group experts. These professionals are however very important for the translation of expert texts that cannot be performed without expert domain and expert language competences. A possible solution might be to fund joint projects for the translators and target group organisations in order to enhance their target group competences and create content.
- 3) Academically trained Easy Language translators with a profile in translation studies and accessible communication. As part of their curriculum, they have close contact with the different target groups of accessible communication. They receive theoretical instruction and practical training. This profile is new and as of now, there is only a small number of graduates but they are joining a job market that is eagerly demanding this profile. Academically trained Easy Language translators heal the opposition between the different kinds of knowledge and skills.
- 4) Editors in broadcasting or other media institutions specialised in accessible communication that transfer standard content to accessible formats (for profiles of professionals involved in the production of Easy Language audiovisual content, see Perego 2020).

As there is a demand for expert texts, especially from the legal and medical domains, expert translators are needed to create those texts (Maaß 2015, 2019a, Maaß/Rink 2020). The professionalisation of Easy Language translation follows the same steps that Holz-Mänttari (1984) demanded for interlingual translation, which has since been professionalised. She speaks of a “vicious circle” that can only be disrupted by science, “as only there can the ‘recognition’ of conditions lead to constructive measure. Persisting questions that are now being posed louder and louder by field experts can accelerate this process. [...] We have come to a point where naturally grown, intuitive acting of the four groups (that is: contractors, translators, instructors and researchers – CM) no longer meets the requirements and is no longer acceptable for society” (Holz-Mänttari 1984: 165, my translation). We witnessed a comparable process for intersemiotic translation: Just a few years ago, subtitling or audio description were mainly executed by staff trained on the job; now the field is dominated by academically trained experts, as audiovisual translation has become part of specialised master’s programmes mainly under the roof of translation studies. The same trend is emerging in Germany for Easy Language translation. This leads to a professionalisation and academisation of Easy Language translation.

As far as research is concerned, there is still a blank spot with regard to Easy and Plain Language translators. There is research on text and text types in Easy Language (for example, Rink 2020, Ahrens 2020, Kröger 2020, Maaß/Hernández Garrido 2020), on perception, comprehension and recall on the part of the target groups (for example, Gutermuth 2020, Deilen 2020, Sommer 2020) and their use of texts (for example, Bock 2019, Goldbach/Bergelt 2019 and some of the articles in Bock/Fix/Lange 2017). But there is no systematic study on translation processes carried out by Easy and Plain Language translators of different profiles.

5.3 Plain Language text authors

In some countries it is Plain rather than Easy Language that is seen as the instrument to achieve communicative inclusion; this is, for example, the case for Sweden (for Plain Language in Sweden, see Nord 2018; for Easy Language in Sweden, see Bohman 2017). The idea behind is that universal design in language is best suited to include people and that Plain Language would offer one easy-to-understand version of a text for everybody. The Dutch concept of

“Taal voor allemaal” (www.taalvoorallemaal.com/; “Language for all”, basic guidelines in Moonen 2018) also initially implies that there is one language for everyone. But as the concept then reveals three different levels, it is instead the set of the three varieties to offer content for everyone so that a single text would again have to choose which comprehensibility level is best suited in a concrete situation (see Chapter 7 below).

The risk of the one-for-all solution is that what is acceptable to everyone still needs to be comprehensible enough for people that need enhanced comprehensibility and perceptibility. “Everyone” would include people with all kinds of educational backgrounds that have knowledge of discourse forms and text types and have certain expectations with respect to texts and the standards they should adhere to. On the other side of the spectrum, “everyone” would also include people with special communication needs that have no access to those standard texts and whose discourse knowledge diverges from the average.

Perceptibility and comprehensibility on the one side and acceptability and the risk of stigmatisation on the other side are two sides of a balance (see Chapter 7.1). The risk is that the balance might tip to one side, excluding people with special communication needs from the contents (and thus, from acting on the basis of the information withheld by the text). Or that it might tip to the other side, endangering the consent of the majority population and potentially stigmatising people with special communication needs as ‘those who corrupt the standard’. To identify the tipping point will not be possible without research; and such texts will have to be carefully conceived and produced by experts for accessible communication. If this is not done, the one-for-all solution will most probably not lead to communicative inclusion.

However, this is usually not how Plain Language text production is carried out. **Plain Language text authors (2)** are mostly domain experts that are given the additional task of writing in a comprehensible way. Some are specially trained, but this training seldom goes beyond a very limited number of hours and does not imply a consistent monitoring of the text practice. This is different for Easy Language texts, which are mostly written or translated by Easy Language experts and usually not by domain experts. In practice, Easy Language writing is predominantly performed by accessibility experts, whereas Plain Language is associated with the domain experts.

Plain Language often has a divulgative approach to knowledge communication on a certain subject that is presented in a clear and plausible way. That is, Plain Language is often used, in practice, in a subject-matter-oriented way. Yet,

the theoretical concept of Plain Language is user-oriented. But user-orientation will only work with a focus on a concrete user group: private investors to be informed about an equity fund; clients of a law firm that have to sign a form. This is how Plain Language was conceived and this is consequently how the choice of language complexity is legitimised within the concept. Some concepts are based on virtual user groups, like Cutts (¹1995, ⁵2013, see above, Chapter 4.2), who invited Plain Language authors to write for users at “reading age 13”, the supposed average reading age among adults (Cutts 2013: xiii). This suggests that domain experts will be able to decide which the appropriate linguistic means and adequate text complexity for reading age 13 are, and to consistently stick to those means while describing their own expert field of action. Domain experts that are drafting texts often do not even have direct contact to the target groups, even less so if they want to include people with communication impairments that are not their usual average clients.

What normally occurs is that Plain Language texts executed by domain experts are too difficult for people with special needs. On the one hand, Plain Language is founded on a generalisation (“for all”), on the other hand it is meant to be user-oriented and work on the basis of user evaluation. This is a contradiction in the core of the concept that makes it unfit as the sole solution for communicative inclusion. The current Plain Language practice does not correspond to universal design in the sense of universal accessibility as demanded by the UN Convention on the Rights of Persons with Disabilities. To rely on domain experts for communicative inclusion or to burden them with the extra task of making their content accessible for people with communication impairment will not suffice, as they are lacking the necessary skills, resources and focus for this task. Communicative inclusion is an expert matter in its own right. Plain Language in the way it is performed now addresses the general public, but is not an adequate instrument of inclusion.

5.4 Accessibility activists

Accessibility activists are usually not trained communication professionals, but private individuals with or without disabilities who want to make a difference. They contribute to accessible communication where it would not exist without their effort.

Some are crowdsourced activities that are initiated by individuals, but the platform they contribute is then used by a multitude of participants. A promi-

nent German example for this is hurraki.de (hurraki.de). This is a page that creates Easy Language content, especially word explanations, with the help of a wiki that can be used by any interested contributor. Hurraki is one of the big German players in accessibility activism. The page also offers all kinds of news and event records around (and in) Easy Language. The dictionary entrances in Easy Language are, however, not of reliable quality but rather heterogeneous and situated between “still too technical”, “helpful”, “not correct” and “making fun”. As the administrators are volunteers themselves, there are no resources for assessment and correction. This leads to a situation where some entries provide important and accessible information, whereas others are nonsensical. See for ex. the entry “butt fax” that explains: “A butt fax is a laundry list hanging from your under-pants on your butt side” (my translation); the entry even contains a photo upload. This is clearly meant to be funny but it is also playing games with the whole platform and thus no reliable resource for translators or the target groups.

Some projects are related to religious initiatives of divulgation, for example bible translation projects like www.offene-bibel.de (“open bible”) that usually take the form of a wiki and are seeking crowd collaboration.

There are also private individuals that contribute to accessible communication even if it is not part of their job description:

- They use Easy Language in school to address the parents of their children or in their teaching activity.
- They might provide accessible websites with Easy Language information for their small enterprise, school or charitable organisation.
- They might use Easy Language and other forms of accessible communication in their social media activities on Instagram or in their blogs (an initiative to support such forms of use is www.barrierefrei.posten.de)

Such projects are an important resource:

- They support inclusion and want to contribute.
- They form communities that uphold communicative inclusion as a value.
- They create offers that would not be available without them.
- They usually act outside a market structure and contribute where no public tendering takes place.
- They create traffic on websites that transmit accessible communication.

There are also some few points on the minus side:

- Participants are mostly not trained professionals.
- There is little or no quality control or assessment to discern whether the material is helpful at all.
- Therefore, the various texts on those platforms are of very heterogeneous quality.
- This might harm the image of Easy Language.
- They might suggest that it is easy to produce accessible communication.
- They might suggest that texts are available that in reality are not helpful to the target groups.

Some of these initiatives are forerunners of professional activities that follow or will disseminate where they become part of ongoing legislation. Some of the forms of use described here will, for example, become obligatory under (EU) 2016/2102 (see Chapter 2.3).

5.5 Text assessors

Text assessors (or validators, see Perego 2020: 36ff) are representatives of the Easy and Plain Language target groups. To involve the target groups is a frequent demand in Easy as well as in Plain Language guidelines (see chapters 3.1 and 4.2 above). In practice, though, the target groups are rarely part of Plain Language production processes. The situation is quite different for Easy Language, where practical approaches very often rely on reviewing or even text creation processes that involve the primary target groups. This involvement does not necessarily have a form that yields reliable results, but it is nonetheless considered to be central especially in the context of empowerment (see Chapter 3.1.2). Reviewing processes with the primary target groups on the basis of every single text that is produced are controversial (a critical review in Bredel/Maaß 2016a: 175ff; a plea for text assessment by the target groups in Hinrichs 2019): They tend to slow down text production and complicate consistent terminology management and are thus not necessarily helpful in making consistent content quickly available. To insist on text assessment by representatives of the primary target groups leads to a situation where such market providers that have access to reviewers are preferred even if they are not neces-

sarily translation experts. The resulting texts often stress their differentness with regard to standard texts, increasing the risk of stigmatising the primary target groups. On the other hand, participation of the primary target groups is central for inclusion (Schuppener/Bock 2019: 223). In this context, enabling representatives of the primary target groups to participate in the text creation process is felt to be a feature of primordial importance, especially from within the empowerment movement and organisations for the disabled. This participation contributes to the symbolic function of Easy Language (see Chapter 3.4). Currently, therefore, people with cognitive impairment become involved in parts of the Easy Language text practice on a regular basis in text creation processes as Easy Language text assessors, especially in text projects tendered by public authorities.

They are only partially identical with the primary target groups: people with cognitive impairments are almost exclusively assigned the task to assess Easy Language texts, even if those texts address a much broader audience (see the following Chapter 5.6). Easy Language text assessors are initially instructed on how to give feedback and they are usually involved in group assessment activities. While these assessment activities have an influence on text comprehension and under such circumstances usually do not deliver a real-life picture of the comprehensibility assessed texts, the process of instruction and assessment itself has a very positive and empowering impact on the lives of the participants with cognitive impairments, as is convincingly demonstrated in testimonials (Widmayer 2019, Plagge 2019).

While the impulse to prefer, with regard to text assessment, a group that is subject to stigmatisation processes and needs strong advocacy is therefore understandable, this attitude excludes other groups that are also in need of Easy Language. It adds to the problems of Easy Language and to the stigmatisation of the primary target groups if text assessment by people with cognitive impairments is rated higher than translation quality, as the texts derived from such translation processes show pronounced differentness and reduced acceptability through the secondary target groups (see Chapter 5.8).

5.6 The primary target groups

5.6.1 Easy and Plain Language for people with and without disabilities

The target groups are the real reason for accessible communication (Maaß 2019a: 20); it is about them being able to access content and act on an informed basis. People belonging to the primary target groups of Easy and Plain Language often depend on Easy or Plain Language texts for written (and sometimes: oral) communication and usually do not have access to the standard and much less to the expert texts (see Rink 2020).

Following the requirements of the UN CRPD (see Chapter 2.3.1), people with communication impairments have been granted rights to accessible communication in a number of countries (Germany and some others included Easy and Plain Language, see Chapter 2.3). These rights extend only to people with an acknowledged form of disability. There are also other groups among the primary target groups that are in need of accessible communication on grounds other than disability, for example functional illiterates or migrants with low second language skills (Bredel/Maaß 2016a: 139ff, Rink 2020: 29ff). These groups often considerably outnumber the groups with disabilities and are severely handicapped if they are not provided with accessible communication. However, they usually have no legal rights to Easy or Plain Language texts.

Even if they are not legally entitled, they are often included in Easy Language offers in an attempt to address them in a way that they can comprehend and adequately respond to (see, for example, Ahrens 2020 for Easy and Plain Language in the communication with learners of German as a second language). They are, however, rarely taken into account or directly addressed as far as assessment processes, planning of text offers etc. are concerned. They mostly profit from text offers that are produced on behalf of other groups that are entitled to such texts.

The target groups are extremely heterogeneous in their capacities and their requirements. Some people with cognitive or prelingual hearing impairments are able to read and to process content, others are not or exhibit more difficulties (on the different reading levels of people with cognitive impairments see Günthner 1999, on the reading skills of people with prelingual hearing impairment see Hennies 2009, 2019, Krammer 2001). In oral face-to-face communication, these differences can be addressed appropriately by adapting to the respective communication partner. In written

communication, the options are more limited: Texts are usually addressed to groups rather than to individuals and have to be based on their presupposed needs. This is also a question of resources: of course it would be possible and even desirable to provide texts of different complexity levels. This would, however, inevitably increase the cost of each single text and discourage tenders or lead to a smaller number of texts provided. This is what happens as a result:

- In the case of Plain Language, usually only one complexity level is offered to serve as the text base for everyone. The problem is that this solution excludes people for whom Plain Language is not easy enough. This is easily the case, as Plain Language offers are often situated in the upper, more complex spectrum of the variety, rather than close to Easy Language.
- In the case of Easy Language, the most comprehensible format is offered to complement the original text. The problem is that these texts are visually marked and often provoke harsh reactions from the secondary target groups. Easy Language texts are potentially stigmatising; they are either long or do not contain all the information of the source text, due to the problems that Easy Language exhibits on the text level (see Rink 2020: 99ff, Maaß/Rink 2020). They are not acceptable to all the groups that would profit from them (see Guter-muth's 2020 findings regarding senior citizens and their Easy Language reading and attitudes).

A possible partial solution to this problem is drafted in Chapter 7, modeling Easy Language Plus in the attempt to balance comprehensibility and acceptability as the key requirements of functional accessible communication offers.

Easy, and to some extent also Plain Language are not only about comprehensibility, but also about perceptibility (see Chapter 6). Texts are optimised in terms of their perceptibility by considering other media realisations (not only readable text, but also audio formats etc.; Rink 2020; Maaß/Hernández Garrido 2020). Some among the primary target groups (for example, functional illiterates) need the Easy Language versions of the text because the original version is only provided in writing and in a form that exceeds their below-average reading skills. The result for them is the same as for people who need all features of full-fledged Easy Language: They do not have access to the orig-

inal text but will be able to participate using the Easy Language version. Accessible communication is, thus, a broader field and is not limited to Easy Language and its primary target audience alone. The different features of Easy Language texts provide different groups with access and are needed in their entirety to make communication accessible.

5.6.2 A short outline of the main target groups

Easy Language is closely related to the group of people with cognitive impairments (Schuppener/Bock 2019). In Germany it was the Empowerment movement of these people that brought Easy Language to the political agenda and they are still the group that is first envisioned when Easy Language is brought up as a topic (Maaß 2015: 14ff). The group itself and its advocacy groups strongly claim Easy Language for themselves and also demand to be included in the text production and assessment processes (see Chapter 5.5). But right from the beginning and even by the empowerment movement, other groups were also identified as potential users of German Easy Language texts, due to the source texts not being accessible for them. Dementia, aphasia, psychological disorders of different kinds, autism and so on are all related to difficulties with regular texts (an overview of the target groups with and without disabilities in Bredel/Maaß 2016a: 139ff; Rink 2020: 31ff).

Easy Language is perceived as the communicative home for people with cognitive impairments; on the part of advocacy and empowerment groups, parallels are drawn to sign language as the natural language of deaf people. Easy Language, thus, does not only have the ability to make content accessible, but also has a symbolic function (see Chapter 3.4). However, and differently from sign language users, people with cognitive disabilities are not native speakers of Easy Language (and neither are the translators or text creators). Easy Language is a way to make content accessible for those users; they are addressed with Easy Language texts by people without communication impairments and are not rule-conforming text producers themselves, even if they are often involved in text assessment processes in order to enact participation (see Chapter 5.5). Easy Language encompasses the danger of asymmetric address; it is at first sight unfit to serve as a means to establish identity. Language and culture are normally strong instruments to establish a group identity (Maaß 2002, Janich/Thim-Mabrey 2003). Easy Language is, at least at first glance, not a good candidate in this field:

- In contrast to other group varieties, it shows no tendency to isolate itself from the broad public as it is meant to break down barriers and include individuals through enhanced comprehensibility (see Chapter 3).
- It is not primarily produced by the group it addresses, but by people without cognitive impairments and thus has inherent asymmetry in address (see Chapter 5.2, 5.3).
- It has low acceptability among the secondary target groups and is potentially used to stigmatise the groups that need Easy Language (see Chapter 6).
- Attempts to include the primary target groups in text production processes rather aggravate the problem of creating acceptable communication products (see Chapter 5.5).

Nevertheless it is perceived as meaningful for the group identity of the people with cognitive impairments by the groups themselves and their advocates (see Chapter 3.4, 5.5). Under such circumstances, it is not intended to blend in, but to stand out visibly and mark group identity (see Chapter 5.8.3). This function of Easy Language is reserved solely for the group of people with cognitive disabilities and does not easily reconcile with the other functions of Easy Language (to help establish communicative inclusion, to enable independent action on the basis of textual information etc., see Chapter 3.4) nor with an expansion to other user groups. It is one of the dilemmas of Easy Language that this conflict is situated at the core of the phenomenon and does not seem easily resolvable.

In Germany, like in many other countries, there are initiatives that distribute Easy Language text offers beyond the group of the cognitively impaired. It remains, however, to be investigated who the potential target groups of Easy Language and accessible communication are, what media forms they prefer and what text design is perceptible, comprehensible, and acceptable to them.

As the original texts are too complex for many people to understand, Easy Language has also opened up to people with limited language skills, that is, language learners (see Ahrens 2020), and not only in Germany (the situation of Easy Language with regard to language learners with migration background is discussed in Becker 2020). Some authors have pointed out, that Easy Language may not be suited for language acquisition itself, as it lacks features that are an important part of the regular curriculum (Kilian 2017;

Heine 2017). But it is indisputable that it grants access to texts the standard version of which would not be comprehensible for learners at a non-elaborate language acquisition level. Especially legal communication poses a problem, but also other expert text types like medical communication (Maaß/Rink 2017; 2018).

The number of people that count as functional illiterates is exceedingly high in Germany. Functional illiteracy is defined as insufficient reading and writing skills despite regular school education. Grotlüschen et al. (2018) distinguish four different levels, focussing on the population between 18 and 64 years of age:

Level	Reading proficiency	Number of people in the adult German population
Alpha 1	Below the the word level	0.3 millions
Alpha 2	Below the sentence level	1.7 millions
Alpha 3	Below the text level	4.2 millions
Alpha 4	Poor readers, deficient orthography	10.6 millions

Table 17: Size of target groups in the different reading levels according to Grotlüschen et al. (2018: 6)

The people in the first three Alpha levels are considered functional illiterates in the strict sense; but the readers at Alpha level 4 are also typically not able to read more complicated texts and try to avoid reading which makes it difficult for them to access information.

In order to give an outline of the numbers of people belonging to the different categories of potential Easy Language target groups in Germany, we rely on Bredel/Maaß (2016a: 142) with updated numbers for illiteracy:

	Estimated size of group	Permanent need of Easy Language	Oral communication skills in German on (near) native level	Oral communication skills in other than German language on (near) native level	Fluent reading skills in other than German language
Dyslexia	470,000	-	+	+/-	-
Cognitive disability	400,000–800,000	+	+	+/-	-
Dementia	1,300,000	+	+	+/-	+/-
Prelingual hearing impairment	80,000	+/-	-	+	-
Aphasia	130,000–240,000	+/-	-	-	-
Functional illiteracy Alpha-Levels 1–3	6,200,00	-	+/-	+/-	+/-
Functional illiteracy Alpha-Level 4	10,600,000	-	+/-	+/-	+/-
German as a second language	>1,000,000	-	-	+	+/-

Table 18: Size and profile of Easy Language target groups (based on Bredel/Maaß 2016a: 142)

The numbers are conservative estimates and cannot simply be added up, as they can exist in combinations (Bredel/Maaß 2016a: 143): for example, a deaf person can be affected by dementia or a person with a cognitive disability by aphasia. Many of the groups with communicative disabilities are illiterates and will have been accounted for by the study of Grotlüschen/Riekmann (2011, see also Grotlüschen et al. 2018, Bilger et al. 2012). However, this does not hold true for people with severe forms of disability as the study excluded any person

that could not follow the instruction given by the research personnel and did not include people living in facilities for the disabled. Generally speaking, multiple disabilities are rarely taken into consideration in research on accessible communication (Rink 2020: 46ff); for an outline of the combinations of disabilities often encountered in the primary target groups of Easy Language, see Schuppener/Bock (2019).

5.6.3 Old age as an underestimated factor in accessible communication

The biggest factor to create a need for accessible communication is old age (Maaß 2019a). Disability is mostly acquired, not congenital, and prevalence of disability rises sharply with age:

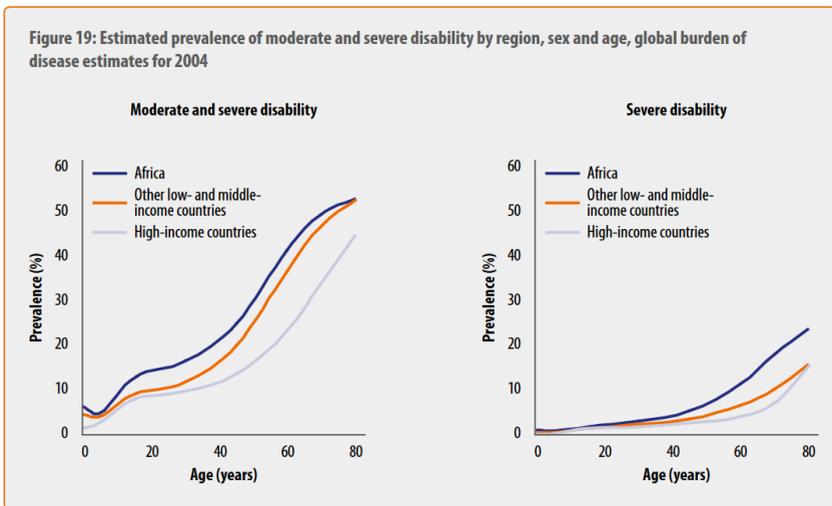


Figure 19: WHO (2004: 33)

“The average global prevalence of moderate and severe disability ranges from 5% in children aged 0–14 years, to 15% in adults aged 15–59 years, and 46% in adults aged 60 years and older” (WHO 2004: 34). In high-income countries, around 45% of all people over 80 years suffer from moderate or severe disabilities with 15% suffering from a severe disability. In Germany, almost 6 million out of 83 million people are 80 years old or older and 23 million are 60 years or older (German Federal Statistical Office, Statistisches Bundesamt 2017). The most common causes of disability are hearing loss, vision problems and mental

disorders; all are connected to communication: communication has to be perceived through sensory channels and cognitively processed.

Almost 50% of the blind lose their sight after the age of 80. The most common cause of blindness in Germany is age-related macular degeneration. Only a small minority of the blind in Germany are able to read Braille (Nachtigall/Fellbaum 2007). This means, by implication, that the majority of the blind are not Braille readers. While Braille remains an important means to dismantle sensory barriers in texts for people with visual impairment, these figures show that Braille alone is not sufficient to make content accessible to blind people.

Visual impairment is much more frequent than blindness. The official categories to qualify someone as visually impaired are quite strict in Germany: Visually impaired means a maximum of 30% remaining sight on the strong eye; this is not much and it means, that there is a much bigger number still of people in need of perceptibility enhanced communication than those 1.2 million people in Germany that are officially visually impaired or blind (Bertram 2005, Nachtigall/Fellbaum 2007).

But the number of people with reduced vision is even greater. Due to presbyopia, vision becomes blurred from a certain age, in many people as early as in their forties. Another cause for blurred vision are cataracts. This is a clouding of the eye lens which leads to reduced eyesight. According to the professional association of ophthalmologist in Germany (BVA), more than 90% of the people between 65 and 75 years of age have a cataract at least in one eye and at least half of them have reduced vision. Unlike presbyopia, this reduced sight is not easily compensated with glasses. Many people get eye operations, but not all of them and most of them not immediately. This leads to a very large group of old people being affected by reduced eyesight. The same holds true for hearing impairments: In Germany, there are around 80.000 deaf sign language users, but ca. 14 million hearing impaired (Heger/Holube 2010), most of them with age related forms.

Of course, not all of these people need Easy or Plain Language. What they do need, are forms of accessible communication that are appropriate to their needs. Easy or Plain Language might, though, often be part of the package: In Gutermuth's (2020) study, the test group of senior citizens profited the most from the Easy Language version provided, even if no other impairment like dementia is involved. Neither the original nor the Plain Language version of texts on the new Transparency Law (the Transparency Law of the German Land Rhineland-Palatinate; "Transparenzgesetz") rendered such good results for comprehension and recall. And yet, the same group showed the most nega-

tive reactions to the features of the Easy Language text: They are, among her test groups, the ones that most fervently decline Easy Language offers, as they are perceptibly different from what they had expected and thus, prone to stigma (see below, Chapter 6). Senior citizens look back on decades of media reception and have developed habits and media preferences. Easy Language texts usually do not meet those preferences and produce rejection within this group. The seniors tend to feel menaced by degenerative processes linked to their old age; they are threatened by a loss of status and independence. Dementia-type illnesses trigger stigma (Finzen/Schomerus 2014). Easy Language texts incorporate an asymmetry in communication that is further stressed by some of the visible characteristics of layout and imagery. The senior citizens in Gutermuth's (2020) study sensed the potential stigmatisation arising from those texts and tended to not find them acceptable. Therefore, the Easy Language version was the most comprehensible but the least acceptable for them among the texts that were tested in Gutermuth's (2020) study.

Considering these facts, Easy Language texts do not only have to be formulated according to language rules as described in Chapter 3, but they have to be put in a mediality that is traceable and perceptible to the target groups. Their acceptability has to be thoroughly considered; it is, in fact and alongside with perceptibility and comprehensibility, one of the pillars of functional accessible communication (see Chapter 11). And the target groups comprise groups, even big ones, that have so far not been taken into account appropriately.

As is true for the other target groups, the group of the senior citizens is heterogeneous. Many old-aged people of different profile are in need of Easy Language, among them

- ... people who, as retirees, have been restricted to their private lives, and are abruptly confronted with expert texts, possibly in situations perceived as threatening like in doctor-patient communication in the face of a grave illness, or with texts related to a new practice that they so far have not actively participated in;
- ... people who have been poor readers all their lives;
- ... people who have come to the country where they are ageing now as grown-ups and have never acquired sufficient language skills to cope with medical or legal information;
- ... people who have reduced attention spans or memory performance due to old age or beginning dementia-type illnesses;

- ... people with congenital or long-term disabilities who are now ageing. This group was not very big in the past; in recent years, though, life expectancy for people with many types of disabilities has been rising.

According to Putnam (2007: 5), the “field of disability studies [has stretched] to include older adults”. Putnam (*ibid.*) also stresses that disability and old age are not easily addressed with the same measures and policies. In the field of accessible communication in general as well as Easy Language research and text production in particular, there is still very little awareness of the special communication needs of senior citizens with communication impairments. To understand the communication needs and to provide communication products for this group is, thus, a major desideratum of research and text practice.

The factor old age is generally underestimated in accessible communication research: Senior citizens are not considered in the studies on illiteracy; those are usually limited to the working population excluding old age. The leo. study that was cited above focuses on the population between 18 and 64 years of age. Other reading comprehension studies (like PISA) focus on students. To focus on accessible communication products that are functional to the group of senior citizens remains a desideratum yet to be fulfilled.

5.7 Domain experts

5.7.1 Domain experts as users of accessible communication

Domain experts use Easy Language and accessible communication in general in their contact with the primary target groups. The communication products are either produced by the domain experts themselves (as is often demanded from them with respect to Plain or citizen-oriented language), or are provided in oral or written form by experts for accessible communication. In complex organisations like public administrations, it is often the communication-related departments or top management that make the decision on using Easy Language texts. In many cases, the authorities that order the texts are not identical with the domain experts who are expected to use those texts in their everyday client contact; this may lead to misconceptions on the nature of those texts and the ways they have to be designed and later used (for the implementation of an inclusive organisation culture, see below).

The need for accessible communication in professional interaction is based on the demands of the UN CRPD, Article 2.3, to avoid “discrimination on the basis of disability”:

“Discrimination on the basis of disability” means any distinction, exclusion or restriction on the basis of disability which has the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise, on an equal basis with others, of all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field. It includes all forms of discrimination, including denial of reasonable accommodation; (UN CRPD, Article 2.3)

Article 2.4 defines “reasonable accommodation”:

“Reasonable accommodation” means necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms;

People with communicative impairments need different forms of accessible communication (for example, Easy Language texts or interpretation) in order to exercise their rights. This applies, among others, in the following domains:

- exchange with administration officials or case workers
- exchange with medical staff, including doctors
- exchange with representatives of judicial and executive power (at the police station, in court)
- participating in commercial interaction

Communication barriers that occur in these types of situations hinder people with communication impairments from enjoying and exercising their rights and freedoms and thus have to be dealt with.

There are different techniques depending on the modality that is required in a certain situation, and on the nature of the impairment; some forms are executed by specialised experts such as Easy Language translators or interpreters, sign language or speech-to-text interpreters (see Chapter 5.2); others are mostly executed by the domain experts themselves (see Chapter 5.3).

All these types of accessible communication, including Easy and Plain Language translation, are used by domain experts to achieve successful interaction with their clients. Domain experts are expected, to a certain degree, to produce Plain Language for their oral and written interaction with the target groups as their clients (see Chapter 5.3). This often leads to a situation where Plain Language texts are not easy enough for non-expert users or even users with special needs because domain experts can struggle to break down their subject matter in a very comprehensible way. This practice is a limiting factor of Plain Language as a means of accessible communication. Moreover, Plain Language will not always suffice. The German Federal Act on Equal Opportunities of Persons with Disabilities (BGG) prescribes that administration staff have to try Plain Language first and then resort to Easy Language (see Chapter 2.3.2). Easy Language texts are planned to be centrally provided for use by the administration staff.

The notion is that these manifestations of accessible communication (including Easy Language) will

- ... facilitate or even enable the work of domain experts,
- ... save time that may then be dedicated to their regular business according to their qualification as domain experts,
- ... help avoid serious mistakes or unwanted consequences, like lack of compliance to a treatment plan due to patients' misunderstandings or not understanding the doctor-patient communication, or a whole courtroom waiting for a witness because he or she did not understand the subpoena etc.,
- ... help establish a customer friendly, citizen-oriented environment that shapes the perception of the whole institution.

Easy Language texts, be they in oral or written form, can be used in concrete expert-lay interaction in different professional settings. They will only work properly if they are designed to correspond to those situations. Bredel/Maaß (2016a: 186f), Maaß (2019b: 285ff) and Rink (2020: 125ff, 170ff) propose applying the approach of situated translation that systematically takes into account the functionality of the translated text in the concrete target situation, see, for example, the approach of Holz-Mänttari (1984) and, building on this approach, Risku (1998, 2016).

5.7.2 Implementing accessible communication in organisations

Introducing accessible communication in expert-client communication may sound like a good idea, but it is much more difficult to implement in situations where it has not been previously practiced.

Organisations like administrations or enterprises are quick to add the tag “inclusion friendly” to their mission statements. They like to convey the notion that they are modern, diverse, and in any form inclusive. This is a noble objective, but changes to the mission statement will not automatically change the corporate culture or traditions of an organisation or enterprise in communicating with clients. If domain experts on staff are given the impression that another task has been added to the list of demands while no resources have been made available to achieve this new task, they will usually not simply accept and comply. But even if resources are provided (for example, Easy Language texts or the possibility to hire a sign language interpreter), this does not necessarily lead to a change in overall behaviour.

To establish accessibility in communication in an organisation (an administration or an enterprise) requires internal communication management, and the bigger the organisation, the more consideration is needed in this respect.

Administrations as well as big enterprises with client contact are organisations that have developed a certain corporate culture (Schein 1985). This is a top-down and bottom-up process: It involves typical structures of knowledge and behaviour, deep-rooted belief systems and attitudes (Schädler 2019: 649). These include assumptions on the correct handling of people with disabilities in everyday contact. To proclaim an “inclusive organisation culture” and mention it in the mission statement is only a first small step on the way to making it work. As Schädler (2019: 649) points out, an attitude of proactive empathy cannot be simply decreed but has to be discussed and rehearsed. Staff members might feel defensive and oppose the new measures. It will be difficult under such circumstances to bring about a change in the organisation culture that results in changed attitudes and behaviour with regard to clients and/or colleagues with disabilities. What is necessary are measures that change the organisation culture from within (for examples, see Schädler 2019: 650f). Those measures have to include all staff members, but especially those with client contact. Potential reservations have to be openly addressed, previous experiences have to be retrieved, needs and proposals of the domain experts have to be discussed and possibly integrated (an example with routines for implementation in Konieczny et al. 2012).

In German administrations, this communication process with regard to the implementation of Easy Language rarely takes place (an example is given and discussed in Einheuser 2018). In Easy Language projects in the area of accessible administrative communication, we often experience a complete separation between the executive level that commissions the Easy Language translations, and the level of administration staff with client contact that is supposed to use these translation in their future everyday work, that is, there is a disconnect between text buyer and potential text users. If case workers or other administration staff are not included in the inception of such projects, the texts will in fact rarely be used. The reasons are manifold but often very practical and might even seem trivial. The following list contains typical examples derived from projects conducted by the Research Centre for Easy Language (Hildesheim/Germany, see Chapter 3.2.1); the list is based on experience; it is necessarily open and not yet underpinned by research.

Existing Easy Language texts might not be used in the organisation that initially ordered (and paid for) them:

- ... because the texts are made in a way that is not helpful to the potential text users among the staff. The Easy Language text might comprise more pages (big type size, explanations, possibly imagery etc.) than the original and might therefore not fit into the envelopes intended and available for an administration procedure or exceed the designated postage.
- ... because potential text users do not know how to identify which clients they have to distribute the standard texts or Easy Language texts to. This is a delicate matter as sending a person the uncalled-for Easy Language version of a letter might lead to turmoil in the expert-client communication.
- ... because the staff members might be generally opposed to the concept of Easy Language (“The clients should learn the language before coming here”, to cite a standard objection). In this respect, they share the positions of the bystanders and might actually see themselves in the position of passive bystanders with respect to Easy Language.
- ... because the staff members reject the Easy Language texts as they hamper orthography, grammar rules or stylistic standards.
- ... because the staff members find the texts unfit to use in the situations in which they are needed because of the choice of contained information or their media realisation.

- ... because the staff members are insecure about practical problems like the fact that Easy Language texts are usually not legally enforceable and they do not feel in the position to decide whether it is ok to use them in administrative processes.

If those (or similar) questions are not systematically addressed, the texts that have been created with a lot of effort have a high probability of not being used.

In order to avoid such a waste of resources and make the use of accessible communication offers at the workplace more attractive for domain experts, internal communication management is needed. There are approaches from organisational psychology and organisational pedagogics that can help to find strategies.

Schädler (2019: 651ff) and Konieczny et al. (2012), for example, have designed an action concept named “Inclusion-Oriented Administration” (“Inklusionsorientierte Verwaltung”) that comprises five steps to develop concrete recommendations for action that correspond to the local conditions. The concept is directed towards accessibility on a broad scale and has been applied to Easy Language by Einheuser (2018). The concept involves active participation of people with disabilities and their organisations at all stages in order to identify barriers, but also to address reservations among the staff with regard to people with disabilities, and to evaluate possible solutions.

The process takes up the individual level of involvement with the issue of accessibility in an administration and valorises previously implemented steps as a basis for further progress. Existing barriers that have possibly remained unnoticed are identified and solutions are found in a collaborative process.

These situations can involve expert communication from different fields (medical or health issues, legal and administrative matters, instructions of different kind and levels and so on). Products of accessible communication can be produced by the domain experts themselves, or by specially trained language or text experts.

Such measures are the basis for successful implementation of Easy Language (and, more generally, accessible communication) in expert-client communication within larger organisations.

In smaller organisations or in direct contact like doctor-patient interaction, professionals might find it easier to articulate their needs for Easy Language communication products. Easy Language medical and health communication would be, for example, a great asset for health literacy and facilitate the work of the medical staff. However, at the moment, there is still a severe lack of ade-

quate Easy Language texts in this area, even if a number of associated projects is currently underway.

To involve the domain experts in a discourse on accessible communication might help avoid producing texts that do not meet their expectations and are, therefore, not helpful in domain expert-client interaction.

5.8 The secondary target groups as text users and bystanders

5.8.1 Different attitudes and forms of handling Easy Language text offers by the secondary target groups

The secondary target groups play a much more important role for the success of Easy Language than is generally acknowledged. The secondary target groups are persons that are confronted with a publicly available Easy Language text offer even if they in principle have access to the original text offer in standard or – to varying extents – in expert language (Bredel/Maaß 2016a: 172). This contact can be of different shape; they can...

- ... inadvertently come across the texts, for example because they are part of a website or an official letter, like polling information.
- ... read press coverage on Easy Language and then go and actively search for material.
- ... be forced to read the Easy Language material as no standard version is provided.
- ... choose to read the Easy Language material as it is more accessible for them than the original version.
- ... be indirectly addressed as Easy Language texts that are often used by authorities or enterprises as symbols for a positive attitude towards inclusion.

People belonging to the secondary target groups will then develop an attitude towards the Easy Language texts. They can...

- ... ignore text offers as they are not primarily addressed.
- ... distance themselves from the texts, for example by means of irony.
- ... feel the need to stress that they do not belong to the primary target groups.

- ... react in a hostile way towards the text senders or towards the primary target groups.
- ... use the texts as a welcome means to overcome the difficulties they might have with the source texts.
- ... feel reminded of the diversity of needs of the target groups.
- ... show interest in producing Easy Language texts themselves or contributing to inclusion in another way.

The secondary target groups are not directly addressed by Easy Language, but accidentally come across Easy Language texts or are indirectly addressed (see below). They are bystanders or close to primary target groups and in such cases, become Easy Language text users themselves.

The tenor of their response to the Easy Language texts they encounter in the public depends, among others, on the quality of the texts, that is, whether the texts are conceived as inferior to the standard versions, and whether Easy Language texts are conceived as replacement for the standard texts.

Inclusion as a social goal strives to achieve that people or groups with diverging conditions are seen as regular part of the community, “and to prevent isolation or segregation from the community” (UN CRPD, Article 19 b). Awareness is raised if special needs are made perceptible; people that strive to include their fellow citizens with disabilities might want to learn what to do to meet their needs. They need to be reminded to act in a way that enables inclusion. If they are not visible, people with special needs run the risk of seeing their needs forgotten. Easy Language texts in the broader public, for example, on a ministerial website or as part of polling information, help to maintain a focus on those needs. They are visibly different from the standard and thus, keep up focus on the target groups of Easy Language, that is, people with communication impairments (the symbolic function of Easy Language, see Chapter 3.4). But this visibility has a downside: Easy Language texts often stress their affiliation with the group of people with cognitive impairments by choosing a certain layout and text qualities that visibly stand out from traditional text practice. This comes at a price (see chapters 3.5 and 6).

Plain Language is not suited to granting consistent inclusion for many people from the primary target groups, as it is not perceptible and comprehensible enough. Easy Language is needed to achieve that goal. In order to make Easy Language texts available on a permanent basis and with broadening text offers, it is not helpful to go against the sensitivities of the majority society. Expand-

ing Easy Language offers need the constant support or at least the persisting tacit tolerance of the broader population. This becomes difficult if Easy Language texts are confronted with strong and enduring rejection by the majority of the people. Legal achievements for Easy Language may be rolled back if they meet strong public resistance (for an example, see Chapter 2.4). The challenge of making Easy Language recognisable on the one hand and yet keeping it at least partially acceptable to the secondary target groups on the other hand persists.

5.8.2 The secondary target groups as text users

There are different reasons why members of the secondary target groups read Easy Language texts (Bredel/Maaß 2016a: 173f):

No standard version available: Easy Language texts are not suitable to substitute standard or expert versions of texts. Easy Language does not suffice in terms of language variation and does not comply with discourse rules and text type traditions. People belonging to the secondary target groups tend to react in a hostile way if Easy Language supplants (or is suspected to supplant) standard text offers. This suspicion may lead to an attitude that is detrimental to the primary target groups and their acceptance: Easy Language is then seen as perilous to the standard language (see chapters 6.1, 6.2). To offer only Easy Language versions of any text for all readers is a hazard to the acceptability of Easy Language as a concept and of Easy Language text practice as a whole.

Enhanced accessibility saves time and effort: High-quality Easy Language texts enable experienced readers to access content quicker as those texts are linguistically easy, well-structured and have enhanced perceptibility. In those cases, readers are in a position of strength: they have access to the standard or expert text, but are able to choose a more convenient solution that allows for more efficient information retrieval. Such forms of use do not carry stigma (see Chapter 6.2)

No access or reduced access to expert communication: Average readers often have difficulties retrieving information from expert texts, especially from the technical, medical or legal/administrative areas (Maaß/Rink 2017, 2018). These expert texts are often used in an inadequate way to address non-experts, for example, in administrative communication that is often too difficult even

for average readers (Rink 2020). At the same time, such expert texts are used in complex and difficult situations (for example, understanding a medical diagnosis or a treaty). Easy Language texts are frequently used beyond the primary target groups in such contexts and are usually welcomed in those situations.

The secondary target groups might be close to a primary target group: A very large number of people has low reading skills or mildly reduced comprehension, especially in expert-lay contexts. They have no legal rights to comprehensibility-enhanced material, even if they have no or reduced access to the expert communication addressed to them. This is again true for legal and administrative communication (Rink 2020), but also for medical communication (Schaeffer et al. 2016, 2017). They do not necessarily need Easy Language text offers, but would benefit from Plain Language offers situated on the lower part of the spectrum (this is, in fact, what the German National Action Plan Health Literacy suggests, see Schaeffer et al. 2018). Those texts are not provided to a sufficient scale. If there are Easy Language text offers at hand because people with communication impairments have legal rights to those texts, then the less experienced readers or people with information processing abilities slightly below the average will also benefit from Easy Language text offers. Sometimes, people belonging to this subgroup of the secondary target groups verifiably benefit from Easy Language text offers but reject those offers. An example is shown in Gutermuth (2020): the senior citizens among her test subjects benefitted the most from Easy Language but felt deterred by its layout features. Members of the secondary target groups that are afraid they will be judged as belonging to the primary target groups will also often decline text offers (for example, again, old people that refuse Easy Language offers on the grounds that they fear to be considered demented or in other ways disabled). This large group does not belong to the primary target groups in the strict sense, but cannot do without accessible communication, be it Easy or Plain Language.

5.8.3 The secondary target groups as indirectly addressed bystanders

Secondary target groups may be accidentally confronted with Easy Language offers that are meant for other groups. But they are also – intentionally or non-intentionally – addressed by Easy Language offers, and by two different groups, namely by empowerment activists producing Easy Language texts and

fighting for equal rights for people with disabilities as well as enterprises and institutions offering Easy Language texts. Those indirect communication acts are linked to the symbolic function of Easy Language (see Chapter 3.4). The symbolic function entails a risk of triggering stigmatisation processes and thus achieving the opposite of what is intended. The next chapter will look into these mechanisms.

6 Stigmatisation of the primary target groups through Easy Language

The need for Easy and Plain Language is defined by the complexity of the source texts, which, in different respects, represent barriers to reception; they presuppose skills (for example, reading skills) and knowledge that the target audience regularly does not have. People or groups that do not have access to information will need accessible formats, Easy Language being one of the strategies to establish accessibility. This approach proposed in Maaß/Rink (2019b) and Rink (2020) (see Chapter 1.2 in this volume) explicitly does not contain an attribution of deficits to the target groups of accessible communication offers. It merely aims to match communication offers with the needs of the target groups' requirements in order to make them adequate (for adequacy as a target of Easy Language translation see Hansen-Schirra et al. 2020b; for a reflection on the adequacy demand with respect to Easy Language in general see Schiewe 2017).

But even if this approach is based on the idea that texts have to be adequate for their target groups, it contains ascriptions with regard to the primary target groups of Easy Language, associating them with groups that are easily stigmatised and stressing their communication impairment which is a stigma in itself. This is a dilemma that remains unresolved in accessible communication. It is important to give this aspect more attention as there are strategies to lessen or enhance the danger of stigmatisation.

6.1 Disability as stigma

Cloerkes (2001: 7, my translation) defines disability as “permanent and visible differentness, bodily, intellectual or psychological, to which a negative value is generally attributed”⁶. The criterion of permanence is used to demarcate “disability” from “illness”. The criterion of visibility means perceptibility of this differentness by the others. “A human being is ‘disabled’, firstly, if that person

6 “dauerhafte und sichtbare Abweichung im körperlichen, geistigen oder seelischen Bereich, der allgemein ein entschieden negativer Wert zugeschrieben wird” (Cloerkes 2001: 7).

displays an undesired differentness from any expectations however defined, and if, secondly, social reactions to that person are therefore negative”⁷ (Cloerkes 2001: 7, my translation).

This definition is based on a normativistic concept of disability (on normativistic in the context of other concepts of disability, see Schramme 2003: 73ff, Nordenfelt 2001: 3f, Felkendorff 2003), which focuses on the perception of disability by the majority society. A person with a disability displays “an undesired differentness from what we had anticipated”, as Goffman (1963: 6) puts it in his groundbreaking work *Stigma. Notes on the Management of Spoiled Identity* (1963). Stigma is “an attribute that is deeply discrediting” (Goffman 1963: 4) and reduces a person “in our minds from a whole and usual person to a tainted, discounted one” (Goffman 1963: 4). The stigmatized person is “the bearer of a ‘mark’ that defines him or her as deviant, flawed, limited, spoiled, or generally undesirable” (Jones et al. 1984: 6). With such a spoiled identity, positive self-identification is very difficult – this is another aspect of disability that the normativistic concept points to. This is where the concept of “empowerment” is situated: it is “a multi-dimensional social process that helps people gain control over their own lives” (Page/Czuba 1999: 1) thus enabling them to win the power for such positive self-identification in a situation associated with stigma. Stigma is always defined as detrimental and has an affective component: Representatives of the majority society that define the norm feel intuitive emotional rejection toward the stigmatised person or group. The stigmatising attribute is usually generalised to the whole person (Cloerkes 2001: 135). Goffman (1963), in fact, calls the representatives of the majority society “the normals”: “We and those who do not depart negatively from the particular expectations at issue I shall call the normals” (Goffman 1963: 6).

The Easy Language target groups face restrictions with regard to perceiving and understanding texts (including the faculty of being able to read those texts); they are subject to stigmatisation, because a communication impairment is a stigma, even more so if a cognitive disability is the reason for this impairment.

Research on illness and disability as a stigma has been intense since Son-tag’s seminal work published in *Illness as Metaphor* (1978) and *AIDS and its Metaphors* (1989), key topics being:

.....
7 “Ein Mensch ist ‘behindert’, wenn erstens eine unerwünschte Abweichung von wie auch immer definierten Erwartungen vorliegt und wenn zweitens deshalb die soziale Reaktion auf ihn negativ ist” (Cloerkes 2001: 7).

- cancer and stigma: there have been many newer publications, not least with a quantitative design, especially in the field of sociological psychology, see for instance, the psycho-oncological publications by Mehnert and Ernst (for ex. Ernst et al. 2017 and Ernst et al. 2016)
- AIDS and stigma (for ex. Liamputtong 2013)
- mental illness and stigma (Yanos 2018, Finzen 2013, Feldman/Crandall 2007)
- cognitive disability and stigma (Weiske 2008)
- and, to a lesser extent, also dementia-type illnesses and stigma (Milne 2010, Kaduszkiewicz 2009)

While AIDS is linked to contagion (see Jones et al.'s 1984 criterion "peril" below) and, in addition, is socially stigmatised because it is transmitted through sexual practices that are perceived as partially deviant, the stigma of cancer lies on a different level:

"Contact with someone afflicted with a disease regarded as a mysterious malevolence inevitably feels like a trespass: worse, like a violation of a taboo. The very name of such diseases are felt to have a magic power." (Sontag 1978: Chapter 1)

This leads to "practices of decontamination [...], as if cancer, like TB, were an infectious disease" (ibid.); as cancer (and other such illnesses) is "treated as a mystery and acutely enough feared" it is even "felt to be morally, if not literally, contagious" (ibid.). Disability and disease confront the bystanders with their own transitoriness:

"To encounter a physically disfigured person easily becomes a threat to one's own physical identity, to experience the serious physical illness of a person confronts with one's own strenuously contained fear of illness and death." (Finzen 2013: 50, my translation)⁸

Attitudes towards disability and disease have a strong affective component; a very common form of reaction is dissociation and stigmatisation of the person that is perceived as menacingly different. This emotional and factual dissociation

.....

8 "Die Begegnung mit einem körperlich Entstellten wird leicht zur Bedrohung der eigenen körperlichen Identität, das Erleben von schwerer körperlicher Krankheit eines Menschen konfrontiert mit der gelegentlich mühsam kompensierten Angst vor eigener Krankheit und vor dem Tod." (Finzen 2013: 50).

tion does not only affect the stigmatised person, but also their environment. As a matter of consequence, in order for one's identity to become damaged it suffices to be associated with the stigmatised person or group. This applies to family members (Goffman relates the history of how the former conviction of her father lead to the social isolation of his 12-year-old daughter) as well as persons that are professionally related to the stigmatised groups (see, for ex., Yanos 2018: 135ff and Finzen 2013).

As Nüsch (2002) points out relating to Hohmeier (1975), stigmata may have an orientation function for a society and its ways of interaction: The majority society or social groups consolidate through common values and the obedience of common rules (Finzen 2013: 48). The stigmatised person or group violates these rules:

“Whatever a social group looks like, its members must be able to recognize and obey to rules, norms and values.” (Finzen 2013: 49, my translation)⁹

Deviant behaviour or features are sanctioned by the majority society. The stigmatised feature highlights the external border of the common values, the stigmatised person is situated outside of this external border and makes it palpable. Thus, through being stigmatised, people that have the stigmatised feature can be used to mark the border, simply by excluding them from the in-groups (Finzen 2013: 50). Of course, this is highly problematic in a moral and ethical sense, but this does not make these mechanisms any less real. Research has shown that emotional repulsion that leads to stigmatisation processes of individuals and groups can be tackled only to a very limited extent by information or awareness campaigns. Cloerkes (2001: chapters 5 and 6) shows convincingly how limited the prospects of success are to changing attitudes towards people with disabilities in a community.

As it turns out, Easy Language contributes to stigmatisation processes; these can be linked to the six dimensions of stigma as conceptualised by Jones et al. (1984):

A stigma is more disruptive if it is perceivable, if it cannot be kept secret (**dimension 1: concealability**). Stigma can be mitigated by concealment. A visible impairment is more stigmatising than an invisible or easily concealable one. Illiterates typically try to conceal that they are not or hardly able to read,

.....
9 “Wie immer eine solche gesellschaftliche Gruppierung aussieht, ihre Mitglieder müssen instande sein, die Regeln, Normen und Werte zu erkennen und einzuhalten.” (Finzen 2013: 49)

even if it is difficult to hide illiteracy in a literate information society (see Dürscheid 2016: 268, who attributes the impression of rising illiteracy rates to its increased visibility). A stigma is more grave if it is permanent than if it is temporary (**dimension 2: course**). Disability is differentiated from disease on the basis of this criterion: disability is permanent, which adds to its stigma in the dimension of course. A feature is more stigmatising the more it strains social interaction (**dimension 3: disruptiveness**). If an impairment is perceived as repulsive, stigma is enhanced (Bredel/Maaß 2019: 264) (**dimension 4: aesthetic qualities**). An impairment that is perceived as self-inflicted is more stigmatising (**dimension 5: origin**). And lastly, the stigma increases if the stigmatised group or characteristic is potentially dangerous (for example, contagious) to other members of the community (**dimension 6: peril**). These criteria need not be met all at the same time: for example, a very visible, permanent mark that is aesthetically shocking and therefore disruptive can be guiltlessly acquired and non-contagious. But the manifestation of each single dimension enhances the stigma of a feature or condition.

To keep in mind these dimensions of stigma is helpful with respect to the attitudes of the broader public towards Easy Language and the groups that need it. Indeed, Jones et al.'s (1984) dimension of the stigma concept displays some interesting and partially dilemmatic manifestations, as I will show in the following (Chapter 6.2).

6.2 Easy Language: considering the dimensions of stigma

Easy Language potentially contributes to stigmatisation processes as it discloses the communication disability. To depend on Easy Language texts triggers negative attributions, because being impaired in communication is widely perceived as a stigma (Bredel/Maaß 2019: 262, Jekat et al. 2020). Thus, to attribute a need for Easy Language texts to the primary target groups is ambivalent: On the one hand, Easy Language texts help overcome communication barriers and make content accessible; on the other hand, identifying a group of people as a primary target group of Easy Language potentially means stigmatising them.

The risk of stigmatisation grows, for example, if Easy Language texts are designed to be different from the standard, for example, if they depart from the standard spelling rules or layout conventions (see chapters 3.3.5, 3.4, and

below). This can lead to the paradox situation of existing Easy Language texts not being used in the situations they were designed for because the domain experts fear stigmatising their clients by giving them the texts; or because the primary target groups that would benefit from the perceptibility and comprehensibility of those texts do not use them in order to avoid the danger of being stigmatised (in bigger organisations like administrations, the tendering authority is usually not identical with the actual domain experts that will use the texts in their everyday contact with the target groups, see Chapter 5.7). In such cases, the opportunity of communicative inclusion is squandered, as the primary target groups need accessible communication products and comprehensibility enhanced texts to participate in society according to their legal and moral rights. The danger of stigmatisation through Easy Language is, thus, a research topic of high relevance.

In the case of Easy Language, potential stigmatisation processes are the downside in the process of granting inclusion through perceptible and comprehensible communication products; those processes are interwoven as can be shown with the dimensions of stigma as proposed by Jones et al. (1984; see above; for an application of Jones et al.'s 1984 dimensions of stigma, see Bredel/Maaß 2016a, 2019):

Dimension 1: Concealability

As research has shown (see above), reducing the visibility of a potentially stigmatising feature and thus enabling the target groups to conceal this feature usually lessens the danger of stigmatisation considerably. With regard to Easy Language, this means that texts would have to facilitate access to the text content and make communicative inclusion possible without drawing the attention of the broader public. The proposal of Easy Language Plus (see below, Chapter 7) chooses this path by assimilating Easy Language texts to what is expected within the discourse while still keeping perceptibility and comprehensibility considerably high.

This option has a downside: If the Easy Language (or Easy Language Plus) texts look similar to the standard texts they are not easily identifiable by the primary target groups. Concealability, thus, reduces retrievability (see above, Chapter 1.4.1): Texts that blend in with standard texts and do not stand out – in contrast to what is typical for Easy Language texts. They conceal their relation to communication impairments. As a consequence, they simply might not be found by the target audience as concealed offers are harder to track down and retrieve (see Chapter 1).

On the other hand, Easy Language texts that stress their differentness and are then openly displayed on official websites are easier to retrieve. They do not seek to conceal their relation to communication impairments but rather openly point to the insufficient reading skills of the people that are addressed with Easy Language. Moreover, Easy Language texts that are publicly displayed are often used in a symbolic way to stress the inclusion friendliness (or: the conformity with the law) of the institution owning the website. Such texts also strive to make the target group they are designed for perceptible in the sense of giving them a voice. These are important functions of accessible communication. If their affiliation with communication impairments is concealed, Easy Language texts lose that symbolic function.

The strategy to openly display Easy Language texts that are divergent from the standard carries an enhanced risk to stigmatise the groups that are made visible. Such texts often trigger particularly negative response from the secondary target groups as they infringe on the dictate to minimise the visibility of a potentially stigmatising impairment. As it shows, Easy Language is an ambivalent tool with regard to this dimension of stigma.

Dimension 2: Course

If Easy Language is perceived as a transitional stage that helps users access the standard, that is, if it is perceived as not being required permanently, the discourse around Easy Language tends to be more positive. If the secondary target groups, however, get the impression that the primary target groups need Easy Language on a permanent basis or do not try hard enough to leave the “Easy Language stage”, the responses tend to be more negative. Easy Language is, thus, less stigmatising if it is depicted as a means to help the primary target groups reach the standard texts by improving reading skills over time. This narrative faces two main obstacles:

Firstly, not all the target groups will be able to leave Easy Language behind and access standard texts over time. This applies even if regularly reading Easy Language texts might increase the reading skills of the primary target groups (but as of now, there is no empirical evidence in this respect). Some of the primary target groups have a permanent communication impairment and, thus, a permanent need for Easy Language. For them, the standard text does not only represent a language barrier, but also other types of barriers (a cognitive, expert and expert language barrier, etc., see Chapter 1.2). These barriers are not eliminated for all future texts in all kinds of situations just because some texts are now offered in some situations. There are primary target groups

that are affected by permanent communication impairments, for example, the group with cognitive impairments. These impairments have an impact on conceptual information processing and/or attention focus. The Easy Language need of this group is permanent. Yet, to acknowledge that the need is permanent increases the stigma for the target groups in the dimension “course”.

The second obstacle regards target groups with a migration background. It is a topical element in the discourse around Easy Language to insinuate that Easy Language text offers might encourage the primary target groups not to try hard enough to improve their language skills. Migrants for whom the host country’s language is a second language and that do not have communication disabilities, are not usually faced with a cognitive barrier. This means, they might at some point leave Easy Language behind; many persons belonging to this group in fact do just that. But even here, parts of the group do not blend in with the host culture but remain in their own cultural settings within the host country (they follow the acculturation strategy of separation, s. Estévez Grossi 2018). Those people do not learn the language of the host country beyond a weak or moderate level even after decades have passed. They remain potential Easy Language readers on a permanent basis. Individual manifestations aside, the target groups as a whole will thus have a permanent need for Easy Language.

The group of functional illiterates, that is, persons who do not have sufficient reading skills even though they have gone through the regular school system, does not have a standard profil with regard to the dimension “course”: While some people will be able to acquire reading skills through alphabetisation programmes, it has been shown that not all of them will learn to read standard texts in their adult years (Brödel 2012, Grosche 2011, Egloff 1997). This group also carries a stigma as their lack of reading skills is perceived as self-inflicted (see below, dimension “origin”). All in all, the concept of Easy Language is perceived as less stigmatising if a progression in the reading skills appears possible (Bredel/Maaß 2019: 263). But at the same time, some groups or individuals have a permanent need for Easy Language.

Dimension 3: Disruptiveness

With respect to the third dimension of stigma, the public presence of Easy Language leads to a paradoxon: Publicly displayed Easy Language texts are evidence that the primary target groups cannot access information and find obstacles on their way to participation in the information society. At the same time, Easy Language texts themselves contribute to overcoming isolation, as

they enable participation (Bredel/Maaß 2019: 263f). This is a dilemma: As Easy Language potentially stigmatises the primary target groups it would be better not to display the texts publicly. But to conceal text offers would, on the other hand, undermine participation as the source texts actually pose barriers to persons with communication impairments (note: within complex organisations like a public administration, the authorities that order the translations are rarely identical with the domain experts that are meant to use those texts with their clients, see Chapter 5.7). As is shown, accessibility through Easy Language comes at a cost and needs careful implementation.

Dimension 4: Aesthetic qualities

Easy Language texts are more perceptible and more comprehensible than the source texts, and this at the detriment of other text qualities: language economy – Easy Language texts move implicatures and presuppositions to the surface and are, thus, more elaborate and less economic for the same amount of information, see Chapter 3.3.5 (and, for a possible solution, Chapter 7.2) – and especially the aesthetic quality of the texts. To exploit the variance of language is associated with a sense of beauty of expression. Easy Language, on the other hand, is defined through restriction. Restriction has an aesthetic potential if deliberately chosen. Easy Language texts are mostly translations and thus remain related to the source texts that are more variable with regard to grammar, vocabulary and style.

This leads to an enhanced danger of stigmatisation for such readers who cannot enjoy the beauty and richness of language. This view is palpable in the question that is frequently brought up, whether the classics of literature and philosophy are to be translated into Easy Language. For German, it is the question whether the national poet Goethe or respectively the philosopher Hegel can, should, must or must not be translated into Easy Language. These authors do not actually play a very prominent role in the populations' everyday reading habits. To translate Goethe or Hegel into Easy Language does not correspond to the most urgent Easy Language text requirements of the primary target groups. These authors are rather used in a symbolic way as exponents of high culture and absolute linguistic beauty and complexity that are perceived as being irreconcilable with the concept of Easy Language. They are used as proof that Easy Language is insufficient with regard to the aesthetic dimension of language. Even if the question whether it is possible to translate Goethe is in fact irrelevant for the text types that are mainly translated and used in Easy Language, it points to the patent aesthetic limitation of Easy Language. It po-

tentially contains a degradation. This degradation is transferred to the primary target groups: the question insinuates that those groups have no access to philosophical and literary works, which leads to a potential stigmatisation, irrespective of whether the standard readers often recur to such sources. The question is not whether these groups will actually read Goethe and Hegel but whether they are able to.

Dimension 5: Origin

If carrying the deeply discrediting attribute (in the words of Goffman 1963: 4) is self-inflicted, the stigma is worse. Among the primary target groups of Easy Language are people affected by functional illiteracy and migrants that have lived in their host countries for a long time. In those cases, the attributions “should have been more attentive at school” and “should learn German (or the respective other official language) first” are topical. To point to the fact that people with disabilities are in need of Easy Language can take the edge off such arguments. Especially pointing to “innocently” acquired disabilities that can happen to everyone – like aphasia as a consequence of an accident or a stroke or dementia-type illnesses lessens the stigma in this dimension. On the other hand, to blame persons with disabilities for their situation is part of the typical intuitive relief strategies of people confronted with other people’s disabilities. Sontag (1978) has shown that even cancer is associated with the behaviour patterns and self-chosen life circumstances like an unhappy or inadequate love life of the people affected by the disease.

And to rebut an invalid argument does not necessarily lead to de-stigmatisation: even illnesses like dementia that are recognised as non-self-inflicted carry a strong stigma in other dimensions, for example, because of their disruptiveness. It is, thus, improbable that proving the “innocence” of the Easy Language target groups with respect to the dimension “origin” will discard the stigma that Easy Language texts potentially entail for the primary target groups.

Dimension 6: Peril

The stigma is more pronounced if the stigmatised group poses a danger to the community. In the context of Easy Language, the secondary target groups often display hostile reactions if Easy Language is felt to be generalised; that is, if they have the impression that Easy Language is propagated as the new standard. It is then felt to threaten the national literary language or to obliterate privileges obtained through education. What follows are reader’s comments to

an article on Easy Language in a prominent German news magazine (www.spiegel.de):

- “[...] at some point, it is necessary to set a standard and not compulsively push everything down to the lowest common denominator. This will not be useful to anyone and it will damage society all the more.”¹⁰
- “Somehow this downward development is scaring me. I would tolerate that only for the disabled. All others should please try harder.”¹¹
- “Something new is invented for each small minority until the majority is discriminated.”¹²
- “The government that is happy to save money on the educational system and even counts on governing a stupid people more easily, can be content.”¹³

Easy Language is felt to be unacceptable as the new standard. There is even the suspicion that it could replace the standard language, which leads to massive rejection of Easy Language as well as of the groups it primarily addresses. This negative reaction to Easy Language points to the acute stigma of communication disabilities. To need Easy Language may trigger negative attributions, as, for example, the following: The person or group who needs Easy Language texts ...

- ... is barely able to read
- ... cannot understand “proper German”
- ... cannot participate in specialized discourses without massive help
- ... needs explanation for the simplest facts and correlations and has, thus, most probably reduced mental capacities
- ... cannot grasp the beauty and complexity of the language

.....

- 10 “ [...] irgendwo muss man auch einen Standard setzen und nicht alles zwanghaft runter ziehen auf den kleinsten Nenner. Davon hat am Ende nämlich keiner etwas und es schadet der Gesellschaft nur umso mehr.”
- 11 “Irgendwie macht diese Entwicklung nach unten Angst. Nur für Behinderte würde ich es gelten lassen. Alle anderen sollen sich bitte anstrengen.”
- 12 “für jede noch so kleine Minderheit wird etwas neues erfunden und zwar solange bis die Mehrheit diskriminiert wird.”
- 13 “Der Regierung, die am Bildungswesen gerne finanziell spart und als Mitnahmeeffekt darauf zählt, dass ein ungebildetes Volk leichter zu regieren sei, kann es nur recht sein.”

- ... endangers the German language, if such texts are to be the new standard as part of an inclusive society (Bredel/Maaß 2016a: 51; Maaß 2019a: 32)

These attributions need not be well-founded or true in order to stigmatise the primary target groups. It is therefore at least ambivalent to speak about the target groups and their need for comprehensibility-enhanced communication.

The stigmatisation potential does not apply to people or groups outside the primary target groups: To read Easy Language texts because they grant effortless access to a subject does not carry stigma. Accordingly, “confessions” of persons not belonging to the primary target groups are often accompanied by status markers. This is also the case in the following example that is an extract from a reader’s comment below an article in the German weekly news magazine “Der Spiegel”. The article was called “Accessibility: What is Easy Language and who needs it?” (Barrierefreiheit: Was ist Leichte Sprache und wer braucht sie? 26.9.2018, www.spiegel.de/forum/leben-undlernen/barrierefreiheit-ist-leichte-sprache-und-wer-braucht-sie-thread-807143-3.html):

“Why is everybody so furious? I have a PhD in physics and am an amateur in all different kinds of subjects. Therefore, I am glad if some correlation or other is presented to me in a very simple manner. If I want to know more I can do some research.”¹⁴

By referring to the highest academic degree (the PhD) in a subject reputed to be difficult (physics), the author of these lines clarifies right away that he or she does not belong to one of the stigmatised groups. Moreover, he or she points out that he or she can leave the Easy Language text universe at any time and “do some research”. To seek out Easy Language texts from a position of strength is possible without any risk of stigmatisation. Being dependent on Easy Language texts for all kinds of written information, instead, bears the risk of being stigmatised.

The stigmatising potential of Easy Language is a dilemma as those texts are indispensable for communicative inclusion. It is not acceptable to withhold

.....

14 “Woher der Ärger? Ich bin promovierter Physiker und Amateur in allen anderen Gebieten. Da freue ich mich, wenn mir der ein oder andere Zusammenhang auch mal ganz einfach präsentiert wird. Wenn ich mehr wissen will [sic] kann ich recherchieren.”

Easy Language from the primary target groups only because it reveals the stigma of communication impairments. But neither is it acceptable to ignore that Easy Language potentially stigmatises the primary target groups. One possibility to reduce the stigmatisation potential is to enhance the text quality of Easy Language translation. In the following section, I will discuss an example of a badly executed Easy Language text. The aim is to identify potentially stigmatising features of such texts in order to make them avoidable. Another strategy consists in dissimulating the extent of comprehensibility of a text offer; this strategy plays on the dimension “concealability” outlined above in this chapter. This strategy will be discussed in Chapter 7.

6.3 Features of Easy Language texts that potentially enhance stigma

In Germany, Easy Language at present frequently exhibits features that increase the risk of the stigmatisation of the primary target groups. These features are not necessarily about comprehensibility; practical Easy Language guidebooks contain assumptions on what features might be helpful to the target groups. Some of these assumptions are demonstrably false (like the assumption that the naive visualisations are helpful to comprehension on the text level) but lead to the Easy Language text practice being visually and conceptually very different from the regular text practice. Those texts underline the differentness of the primary target groups in a potentially stigmatising way.

The following example is taken from the text “Patient Decree in Easy Language” that is published by the Ministry for Social Affairs, Health, Women and Family of the German Federal State of Saarland and is freely accessible on the ministry’s official website (www.saarland.de; *Patientenverfügung in Leichter Sprache* 2015). To fill in a Patient’s Decree, people need to confront their fears of their own disease and death, which are themselves subject to stigma, in order to take precautions in the legal context. It is a top candidate for an Easy Language offer, because such an offer potentially puts people with communication impairments in the position to confront the issue independently and on their own. On the other hand, such delicate subjects have to be treated with the greatest caution when implementing them in Easy Language. In the present example, this second mission has not been accomplished. Unfortunately, this brochure is not untypical for the current text practice.

In this example, a highly problematic text is displayed with maximum visibility on an official ministry website and with the minister's signature. Thereby, the stigmatisation potential is even enhanced as the asymmetry in address is officially legitimised. The text does not contain page numbers. The example is taken from the unnumbered pages 23 and 24 of the pdf document:

Be-Atmung

Schwer kranke Menschen können manchmal nicht mehr alleine atmen.

Ihre **Atmung** übernimmt dann eine Maschine.

Dafür wird ein Schlauch in den Hals geschoben.

Der Schlauch geht durch die Luft-Röhre.

Das tut nicht weh.

Es wird in **Narkose** gemacht.

Narkose bedeutet, dass ich betäubt bin.

Narkose ist so ähnlich wie schlafen.

Man merkt dann nicht, was geschieht.

Sie sterben, wenn Sie nicht mehr allein atmen können

Die Patienten-Verfügung gilt nur, wenn Sie bald sterben.

Es könnte sein, dass die Maschine sie länger am Leben erhält.

Aber die Maschine kann Sie nicht gesund machen.

Ich möchte von einer Maschine beatmet werden



Ja

Nein

(Bitte ankreuzen)

(Patientenverfügung in Leichter Sprache 2015)

Gloss translation:

Ventilation (with hyphen: “Vent-Ilation”)

Very ill people sometimes cannot breathe on their own.

Then, a machine takes over their breathing.

For this, a tube is put into the throat.

The tube goes through the Wind-Pipe (with hyphen and internal uppercase).

This does not hurt.

It is done under anaesthesia.

Anaesthesia means, that I am numbed.

Anaesthesia is similar to sleeping.

One does not notice what is happening.

You die if you cannot breath on your own

The Patient Decree is only valid if you are going to die soon.

It could happen that the machine keeps “her” (probably meaning: “you”, but misspelt) alive for longer.

But the machine cannot make you healthy.

I want to be ventilated by a machine

Yes

No

(Please tick)

It is apparent at first glance that this is an Easy Language text:

Layout features: Each sentence in a new line, 1.5 line spacing, larger font size. These features enhance perceptibility; on the other hand, the whole bro-

chure that only contains 15.000 characters (7 average printed pages) expands to 48 printed pages. Instead of a blank form with short explanations, the users with communication impairments are confronted with a booklet. This format represents a motivational barrier (Lang in preparation) and it is doubtful that it grants easy access for the Easy Language target groups. What this layout indubitably does achieve is to make sure everyone knows, even from a distance, that this is a text for a communication impaired person, postulating that they need their text in this format. This reduces the option to conceal the affiliation of this text with cognitive impairments and enhances stigma according to Jones et al.'s (1984) dimensions of stigma (see above, Chapter 6.2).

Hyphenated spelling that defies orthographic rules: The text contains spellings like “Be-Atmung”, “Luft-Röhre” and many more examples that do not comply with German orthography. In Maaß (2015) as well as Bredel/Maaß (2016a, b, 2017 und 2019a, see also Chapter 2.4) we have discussed that incorrect orthography sharply enhances the danger of stigmatising the primary target groups (dimensions “peril” and “aesthetic qualities” according to Jones et al. 1984). Negative feedback on the part of the secondary target groups frequently targets this outstanding feature of Easy Language that is present in the German practical guidebooks (see Chapter 3.1) and has even made it into a legal text: the Accessible Information Technology Regulation (BITV 2.0, see Chapter 2.3.2). Incorrect hyphenated spelling is perceived as an assault on German as a language of culture and education and tends to elicit a contemptuous prejudice in the secondary target groups (see chapters 2.4 and 3.3.3). In Bredel/Maaß (2016a: 45ff) we expand on contemptuous vs. patronising prejudices toward Easy Language users on the basis of the stereotype approach of Fiske/Cuddy/Glinck/Xu (2002). The Easy Language strategy to structure compounds with hyphens that are not backed by orthography is part of the language-specific rules in the German Easy Language guidelines. The Inclusion Europe project that has drafted Easy Language rules for many European languages has adopted the hyphen rule for German alone as a language specific rule (s. Maaß 2015, Bredel/Maaß 2016a: 84ff and above, Chapter 3.1.1). To avoid incorrect spelling, Maaß (2015) and Bredel/Maaß (2016a, b) propose the use of the mediopoint (see above, Chapter 1.4.2) that is more neutral in this respect. Guterath's (2020) and Deilen's (2020) studies show that the mediopoint is suited to enhance perception; it is nonetheless a marker of differentness that not might be well-received by all members of the secondary target groups (we are still lacking research in this respect).

Naive visualisation: The brochure is illustrated with naive, childlike images. These images mark the text visibly from afar as a text originating from the field of disability, enhancing the stigma for the users at least in the dimensions “concealability” and “aesthetic qualities” according to the model of Jones et al. (1984) (see Chapter 6.2 above). The visual homogenisation of the Easy Language texts in German Easy Language text practice is not helpful to comprehension on the text level as it cancels features like belonging to a text type, expected text content and function (see Chapter 3.3.5). The visualisation allows, however, attribution of the text to the Easy Language text universe: The text can be recognised as a text in Easy Language and can be told apart from “normal” texts. The naivety and childlikeness of the images contribute to lowering the motivational barrier for some parts of the primary target groups while repelling other potential users. In any case it elicits, in the secondary target groups, stereotypical assumptions on cognitive disabilities, which bears the risk of stigmatising the readers.

Linguistic features: The linguistic features of the whole brochure show a significantly reduced acceptability. It displays orthographical errors (beyond the incorrect hyphens) and is unacceptably low in register (stigma dimension: “aesthetic qualities”; Jones et al. 1984). Content that is afflicted by tabu is directly addressed to the target groups without any mitigation: “You die if you cannot breath on your own”. The text as such is not even very easy:

- It contains relatively complex syntax in the form of compound sentences.
- Forms of address change from sentence to sentence (“Then, a machine takes over **their** breathing.” > “Anaesthesia means, that **I** am numbed.” > “**One** does not notice what is happening.” > “The Patient Decree is only valid if **you** are going to die soon.” > “**I** want to be ventilated by a machine”).
- The line of argumentation is not really stringent and it is questionable whether the text will help build up new concepts in persons who do not have prior knowledge of the subject.
- etc.

So the text does not fully correspond to the Easy Language rules with regard to comprehensibility, while simultaneously exhibiting a high stigmatisation potential. It displays differentness and openly breaks with language and text conventions, which maximises stigma for the groups of persons that are associated

with these texts. Stigma would be minimised if the texts would display conformity to conventions, but this is not the strategy of this text – and this also applies for a whole range of similar texts. In the worst case, they are not helpful to comprehension while they are, at the same time, stigmatising to the target groups. Unfortunately, this text is not untypical for current German text practice. Even if there are other texts that are well-executed, such texts stain the image of Easy Language in the public.

6.4 The “ban on staring” and its impact on text quality in Easy Language translation

In Chapter 3.4, I discuss the symbolic function of Easy Language: On the one hand, the pronounced differentness of the texts makes the Easy Language target groups visible and gives them a voice; on the other hand, the perceptibly of different texts are proof of the official institution’s willingness to contribute to inclusion. It is surely not the intention to display faulty and stigmatising texts on official websites. There is another mechanism at work that has been called the “ban on staring” (“Anstarr-Verbot”, Cloerkes 2001).

In June 2019 during an event with media representatives in Berlin, I spoke about the stigmatisation potential of poorly executed Easy Language texts. The representative for people with disabilities of a German Federal State approached me and told me that she herself sometimes found these texts quite strange but did not dare to raise objections (“Who am I to say something against those texts!”).

At the moment, there are many Easy Language texts that are in very poor shape. Such texts do not provide the necessary insight into the text subject and contribute to the stigmatisation of the primary target groups. Nonetheless, many of those texts are displayed on official websites of federal ministries or other authorities, or are distributed in print, for example, by political parties. The question is why such texts are published and why the regular control mechanisms evidently do not work. To assume that authorities merely execute their legal obligation to offer Easy Language would be unfair to the effort and dedication of the average ministerial website editor.

More often, the poorly executed texts are the result of their production process: They are not created by text experts, but in the context of working with disabled persons in the environment of sheltered workshops where bureaus for Easy Language are founded. People with cognitive disabilities or their caregiv-

ers (who are usually not trained translators or other text experts) write the texts themselves and include people with disabilities in the process of text creation (see Chapter 5). They broadly refer to the motto as “Nothing about us without us” that is widely used by the disability movement (see Charlton 2000; for the German context, see Hermes/Rohrmann 2006)) and relate this motto to the creation of Easy Language texts. The resulting texts are often problematic with regard to their balance between comprehensibility and acceptability.

The production process, on the other hand, is inclusive and appeals to contracting authorities who strive to include people with disabilities in decision-making processes. If the texts resulting from such processes reach the contracting authorities, they are often met with concern and unease regarding their quality. The texts are visibly different from what was expected.

The natural impulse would now be to have a closer look and ask questions. But in the context of disabilities, this is socially unwanted. Referring to Davis (1961¹⁵), Cloerkes (2001: 78ff) argues how interaction between persons with and without disabilities can be disturbed. “Normal” interaction is based on the rule of irrelevance:

“The interaction partner has to be met with a general non-evaluative attentiveness. Special features like a visible disability that force themselves upon attention, have to be politely ‘overlooked’, they have to be irrelevant. This is difficult to endure, leads to ‘fictional normalcy’ and strained interaction.” (Cloerkes 2001: 80)¹⁶

Or, as Davis (1961: 123) puts it, in the contact situation with visible disability, the “normal” “may take great pains to disguise his awareness”.

Among the range of social reactions to disability, Cloerkes (2001: 89ff) distinguishes between those that are spontaneous and those that are socially desired: Spontaneously, the differentness from what is “normal” is acutely perceived and triggers the impulse to have a closer look and explore this differentness. This spontaneous reaction contradicts the socially desired reaction to acknowledge and treat disability as something “normal”. The spontaneous

.....
15 It has to be remarked that Davis’ (1961) text is insightful in many respects, but is, at least partially due to its age, not at the height of the current discourse with regard to naming groups with potentially stigmatising features.

16 “Dem Interaktionspartner ist danach eine allgemeine, nichtwertende Aufmerksamkeit entgegenzubringen. Besondere Merkmale wie eine sichtbare Behinderung, die sich der Aufmerksamkeit aufdrängen, sind höflich zu ‚übersehen‘, sie haben ohne Bedeutung (irrelevant) zu sein. Das ist schwer durchzuhalten, führt zu einer ‚Scheinnormalität‘ der Begegnung und zu Interaktionsspannungen” (Cloerkes 2001: 80).

reaction is pushed back by what is socially desired, resulting in a marked dissonance of emotions and, consequently, in a “disturbance of interaction” (Davis 1961: 123f). A potential consequence is the absence of discourse and the isolation of the group with disabilities.

If Easy Language texts are created by non-text experts with the support of people with disabilities that officially attest the comprehensibility of those texts, it is difficult, under such circumstances, for the tendering authorities to intervene if texts are felt to look “strange” or repulsive. The ministerial partner will feel insecure as people with disabilities were involved. The interaction is disturbed. As a consequence, no questions are asked and no critical discourse on text quality is started. This leads to an isolation of the text executing group from the customer that ordered the text. The result is that texts with problematic qualities are made openly accessible and are legitimised by the contracting institution, which in the end enhances the stigma of the target groups. The failure to “break through” to the respective partner and initiate an exchange leads to mere “surface acceptance” (both quoted concepts are again from Davis 1961). As a result, texts of poor quality are openly displayed. The reactions of the secondary target groups to such offers show that this practice runs the risk of contributing to the rejection and isolation of the Easy Language target groups.

6.5 Conclusions for Easy Language text practice

Research has shown that there are limits to the positive effects of awareness campaigns and that such campaigns can also breed resentment (for a review on the respective research bibliography see Cloerkes 2001).

To stress the differentness of Easy Language and to display visibly different texts on official websites may not have the intended effects on inclusion by the contracting authorities. On the contrary, they might fuel irrational fears that usually reinforce rather than lessen stigmatisation. Empirical research is needed to identify the most stigmatising features of Easy Language. On the basis of stigmatisation theory as discussed above, it is to be assumed that those features are potential candidates that overly stress differentness, infringe on spelling rules or stress asymmetry in address. Such features should then be avoided for Easy Language.

If perceptibility and comprehensibility are the main target, Easy Language text will, however, remain perceptibly different and thus display a certain risk

of reduced acceptability and enhanced risk of stigmatisation. The next chapter systemises the four qualities perceptibility and comprehensibility on the one hand and acceptability and risk of stigmatisation on the other hand and proposes a possible solution to the dilemma.

7 Modelling “Easy Language Plus”

The primary Easy Language target groups have no direct access to expert and (at least partly) to standard texts. They need perceptibility- and comprehensibility-enhanced texts in order to retrieve information from texts and to participate and make decisions on the basis of this information. The qualities that lead to maximally perceptible and comprehensible texts also maximally separate Easy Language texts from the standard with regard to text types and traditions. Easy Language texts are not only perceptible and comprehensible, but also perceptibly different. In Chapter 3.4, I argued how this difference is also used symbolically to make the target groups visible, who have been practically “invisible” in the past and whose needs have not been attended to.

On the other hand, texts with enhanced perceptibility (in the two senses of perceiving information and making groups visible) and comprehensibility tend to have reduced acceptability and even carry the risk of contributing to stigmatisation processes (see Chapter 6). Plain Language, by contrast, appears to be more acceptable and does not stigmatise users, but is much less comprehensible. Furthermore, Plain Language texts usually do not have the perceptibility-enhanced features of Easy Language texts (see Chapter 4).

In this chapter, I propose Easy Language Plus as a partial solution to this dilemma. In the next section of this chapter, I will classify the three varieties Easy Language, Plain Language and Easy Language Plus with respect to their levels of perceptibility and comprehensibility on the one hand, and acceptability as well as risk of stigmatisation on the other hand.

Perceptibility is the first prerequisite to text reception: only that which can be perceived can be processed and taken up the steps leading up to action-enabling (see Chapter 1.3). Many features of Easy Language are optimised with regard to their perceptibility. In Chapter 1.4, I showed that the single features of accessible communication are interrelated and have to be mastered simultaneously by the users, but do not always add up in a linear way. **Comprehensibility** is at the very centre of Easy Language: its first goal is to make content comprehensible.

Perceptibility and comprehensibility are in the focus of the Easy Language rules. What has so far not been adequately taken into consideration is that measures that enhance perceptibility and comprehensibility separate the texts

from the standard and often lead to reduced **acceptability** and even increase the **risk of stigmatisation**. This means, perceptibility and comprehensibility are adversely related to acceptability and the risk of stigmatisation. The present chapter aims to explore how these four features can be balanced.

Perceptibility and comprehensibility contribute to the main function of making communication accessible. In Chapter 3.4, I pointed out that Easy Language texts often serve another function: the symbolic function of making the target groups and inclusion efforts visible. In the following section, I will therefore also look at how the comprehensibility-enhanced varieties serve those functions, that is, firstly, to make content accessible, and secondly, to fulfil the symbolic function.

I will then describe potential features of the new variety Easy Language Plus that now need to be empirically validated. The focus will be on the impact that the single features have on textual coherence, language economy and aesthetics.

Textual coherence is a prerequisite with which to access the macro-proposition. Only if the single sentences add up to a coherent whole can the texts contribute to the formation of concepts on the content.

Language economy is necessary for Easy Language texts in order to achieve Scenario C (see Chapter 3.3.5, Actively shaping the information structure): texts need to be correct and functional for the target situation. They are only functional if they do not exceed the comprehension resource of the users. This resource is generally limited, but more so for users with communication impairments (see chapters 1.2, 5.6). The addition strategies presented in Chapter 3.3.5 (Easy Language: Reduction and Addition strategies), which are typical for Easy Language, lead to an increase in volume of Easy Language texts if the same amount of information is to be conveyed as in the source text. Some features (like the layout specifications or the explanation of terminology) are particularly harmful with respect to language economy.

Aesthetics is one of the categories related to stigma: Jones et al. (1984) point to the aesthetic qualities as the fourth dimension of stigma. Features that are perceived as adversely influencing the aesthetics of the text (be it with regard to its linguistic quality or layout features) enhance the danger of stigmatisation.

The three categories **textual coherence**, **language economy** and **aesthetics** are, thus, systematically taken into consideration when it comes to modelling Easy Language Plus.

7.1 Easy Language – Plain Language – Easy Language Plus

Easy and Plain Language both have different profiles with regard to the four features **perceptibility**, **comprehensibility**, **acceptability** and **danger of stigmatisation**.

A powerful strategy to avoid stigmatisation is to conceal the disruptive features (see Chapter 6.2, Jones et al.'s (1984) dimensions of stigma). That is, to tone down the differentness of Easy Language texts from what is expected with regard to discourse traditions. This differentness of Easy Language texts exposes the communication disability of the target groups and threatens to stigmatise those target groups through its very presence. The differentness of Easy Language texts consists in their perceptibly, different layout features employed to enhance perceptibility and their maximally enhanced comprehensibility. These same features increase the danger of stigmatisation and lead to hostile reactions, that is, they lead to a markedly reduced acceptability of Easy Language. As I have argued in Chapter 5.2, Easy Language translations are mainly carried out by specially trained experts and not by the original text authors. But I have also outlined that the differentness of Easy Language is not only used to grant the primary target groups access to content: Markedly different Easy Language texts have the symbolic function of making the target groups and their needs visible for the whole society, and they are used by the organisations that display them, for example on their websites, as a token to prove their inclusion friendliness and their readiness to implement the legal regulations. With respect to those features, Easy Language thus exhibits the following profile:

Perceptibility	Acceptability
Comprehensibility	Danger of stigmatisation
Grants access to content	Symbolic function

Figure 20: Profile of Easy Language (EL)

Plain Language, on the other hand, does not have the striking features of Easy Language. It is close to the standard and is, in many cases, not even recognised as comprehensibility-enhanced by the readers: they simply un-

derstand and do not even notice the effort applied to make the content accessible. Plain Language is part of expert-lay communication. Expert communication usually has reduced comprehensibility for lay persons and potentially excludes them from expert discourse. Moreover, expert-lay communication is often asymmetric. Plain Language works with comprehensibility and appropriate address, that is, content is made accessible to non-experts and the communication asymmetrie is lessened. Plain Language usually has a high acceptability level and is associated with positive concepts like “user-friendly”, “citizen-oriented” or “communication on an equal footing”. As the concept of Plain Language is flexible and user-oriented, it would in principle be possible to address people with diverse needs, also those with communication impairments. But in practice, Plain Language is usually not adapted to the needs of target groups with impairments, but rather to lay persons without impairments. Often, Plain Language texts are not perceptibility-enhanced but remain in the layout of the standard text. As Plain Language comes in a variety of stages that are potentially adapted to the users’ needs (see Chapter 4), perceptibility might be worked on, but it is usually not adapted to the needs of impaired users.

Plain Language is mostly produced by the original text authors themselves, for example the issuing authorities or the medical personnel in doctor-patient-interaction (see Chapter 5.3). There is often no source text; Plain Language texts are often originals, that is, the content is directly put into a Plain Language format. Specialised text experts are rarely involved in the redaction of Plain Language texts (see Chapter 5.3). Plain Language usually does not run the risk of stigmatising the target groups: the test persons in Gutermuth (2020) partly reacted in a hostile way to the Easy, but not to the Plain Language versions of the project texts, to name just one example. On the downside, Plain Language texts are not perceptible and comprehensible enough for considerable parts of the primary Easy Language target groups (see Chapter 4.7). Plain Language is therefore only partially suitable to grant access to content. And as it is not perceptibly different from the standard, it does not serve the symbolic purpose of making the target groups with communication impairments and their needs visible; it is also not suited for displaying a company’s or organisation’s efforts to achieving communication accessibility. Plain Language, thus, has the following profile:

Perceptibility	Acceptability
Comprehensibility	Danger of stigmatisation

Grants access to content	Symbolic function
--------------------------	-------------------

Figure 21: Profile of Plain Language (PL)

In Hansen-Schirra/Maaß (2020a), we call for a systematic integration of acceptability in the modelling of Easy and Plain Language on the search for a trade-off between perceptibility, comprehensibility, and acceptability. This may include departing from some of the Easy Language rules (like segmentation of words, or layout, see chapters 3.3.3 and 6, and below), partially even to the detriment of perceptibility and comprehensibility, in order to enhance acceptability and lessen the danger of stigmatisation:

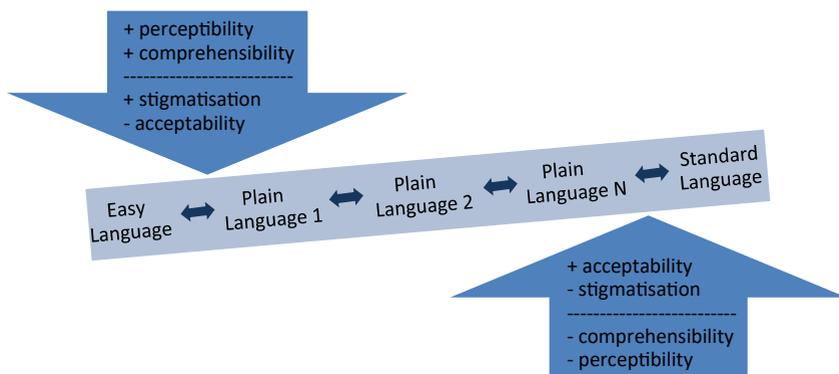


Figure 22: Trade-off between Easy Language and Plain Language (Hansen-Schirra/Maaß 2020a: 24)

Relying on Moonen’s proposal of “taal voor allemaal +” (see the basic guidelines he drafted in Moonen 2018), we thus propose Easy Language Plus (EL+) (also see Hansen-Schirra/Maaß 2020a): Easy Language Plus is a possible solution to enhance acceptability and lessen the danger of stigmatising the target groups while, at the same time, keeping the texts at a high level of perceptibility and acceptability. This is achieved by reducing the most stigmatising features of Easy Language, but keeping the other features of Easy Language intact (for a first modelling of this variety, see Chapter 7.2 below). Easy Language Plus has the following features:

Perceptibility	Acceptability
Comprehensibility	Danger of stigmatisation
Grants access to content	Symbolic function

Figure 23: Profile of Easy Language Plus (EL+)

Easy Language Plus (EL+) has a high level of perceptibility and comprehensibility, even if it is not as high as for Easy Language. Therefore, differently from Easy Language, these features are depicted in yellow, not in green. It is closer to the standard layout and therefore partly conceals its origin in accessible communication. It is much more acceptable than Easy Language and conveys only a small risk of stigmatising the primary target groups. Therefore, differently from Easy Language, these features are depicted in yellow, and not in red. Easy Language Plus is well-suited to grant access to content. As it blends in with standard expectations, it is, unlike Easy Language, not suitable in itself to serve the symbolic function of making the primary target groups' needs and the organisations' efforts visible (see Chapter 3.4). Easy Language Plus texts will usually be flagged as highly comprehensible, for example through a logo or other visual mark. This visual mark makes them recognisable. They do not, however, embody participation in the way Easy Language does when it involves people with disabilities in some stage of the text creation or translation process. Therefore, this feature is depicted in orange, and not in green, like for Easy Language.

Easy Language Plus represents the tipping point of the balance between the four features perceptibility, comprehensibility, acceptability and danger of stigmatisation. It is the most balanced of the three varieties and therefore can be a solution in situations where the main text function is to make content accessible and enable text-based action. Easy Language Plus is an instrument for communicative inclusion. It is a difficult task to keep comprehensibility close to the strict rules of Easy Language while avoiding its most stigmatising features; therefore, Easy Language Plus texts need to be created by Easy Language experts and not by the domain experts.

At the same time, Easy Language Plus is only a partial solution as it does not sustain the symbolic function in the way Easy Language does. The texts are not different enough to make the primary target groups and their needs visi-

ble; they do not vouch for participation of the target groups in the translation process. On the other hand, they conceal the potential stigma of their communication impairments. If organisations choose Easy Language Plus to enable communicative inclusion, they will have to expressly highlight their efforts (for example with a visual mark or logo), as the texts themselves might be perceived as merely comprehensible, but not as belonging to the domain of communication impairments.

The three figures show that Easy Language, Plain Language and Easy Language Plus have very different profiles and are all necessary to cover the whole field of features for communication accessibility.

7.2 Evaluating the impact of the individual Easy Language features

Some of the features of Easy Language contribute more strongly to the reduced acceptability of Easy Language texts and enhance the risk of stigmatisation processes; they have to be identified and mitigated. The language variety emerging on the basis of these rules is situated, with regard to its comprehensibility, between Easy Language and Plain Language in their respective current practices. As Easy Language Plus is particularly demanding, it requires highly trained, skilled translators to successfully supply such texts.

At the moment, Easy Language Plus is a conceptual draft implemented in some model projects. The following assumptions are based on what is known about perceptibility, comprehensibility, acceptability and stigmatisation processes with respect to Easy Language (see chapters 3, 5 and 6). To prove that Easy Language Plus is a robust and helpful solution is a task that needs to be performed via text- and user-oriented research. First results for Easy Language are published in Guterath (2020), Rink (2020) and in the contributions in Hansen-Schirra/Maaß (2020b). Empirical results for Easy Language Plus are still widely lacking.

The concept of Easy Language Plus elaborates on the “chest of drawer” model by Bredel/Maaß (2016a, b, see Chapter 4.6 in the present book): We proposed to approach Plain Language not through a reduction process departing from standard language, but rather through an enrichment process departing from Easy Language. It is to be supposed that the individual features of Easy Language have varying impacts on textual categories like textual coherence, language economy or aesthetics. The same is true for perceptibility, com-

prehensibility, acceptability and danger of stigmatisation that have been discussed comprehensively in the previous chapters.

In a first step, I will evaluate typical Easy Language features on various linguistic levels with regard to their weight on the named categories. This list is neither complete, nor has the real impact been empirically measured with the target groups yet. The values in the following table are estimates on the basis of theoretically based assumptions that have to be tested in empirical research.

The idea is to enable translators to quantify the impact of the single features and to strategically lighten the burden of the different features on comprehensibility-enhanced texts in a well-balanced manner. As the table shows, it is to be assumed that some of the following features are not as important for perception or comprehension, but are especially detrimental with regard to acceptability and thus convey a high risk of stigmatisation. Those are the first to be put at disposal when it comes to modelling Easy Language Plus, that is, a variety that is still much more perceptible and comprehensible than the average standard and even Plain Language text but much more acceptable and less stigmatising than Easy Language. Other features are very important for perceptibility and/or comprehensibility and still highly detrimental to acceptability with a high risk of stigmatisation. To deal with such dilemmatic categories is a component of trained Easy Language translators' responsibilities. Research has to identify the dilemmatic categories in the form of theoretically based assumptions (as done below) as well as in the form of empirical research (which remains to be executed in the future with first results available).

The following table evaluates the impact of different typical Easy Language features and quantifies them on a five-point scale (also supported by a colour coding system). With this method, I emulate the comprehensibility indices (for an overview, see Kercher 2013) that also quantify the impact of linguistic and textual features on comprehensibility and calculate a score. The values for comprehensibility mainly rely on the respective research. As I argued above, comprehensibility is not the only feature at work when it comes to evaluating Easy Language. Therefore, the other categories are also taken into account and assigned a hypothetical numerical value that allows an assessment of the influence of the single features on the main categories. This enables deductions as to whether a certain feature is beneficial, detrimental or neutral with respect to the various categories in the table head.

The idea is to allow for a calculation of the impact of the different linguistic features on comprehensibility, acceptability etc. On the basis of such a calculation, the weight of impact can be systematically and strategically reduced in order to enhance acceptability while perceptibility and comprehensibility still remain within the capacity of the users (see Gutermuth's 2020 model that strives to calculate overall user capacity by adding up the capacity demands from the different linguistic levels). This calculation has to be executed on the basis of the whole table. Of course, it is not feasible to calculate a concrete score for each single text, but it is possible to discern an orientation based on the values in the table in order to ultimately elaborate a translation strategy within projects consisting of more texts or for an entire text type. An example of such a strategic use of the different categories will be discussed in Chapter 7.3 below.

The values for the single categories add up to a score at the end of each table row. The score shows whether the single feature has a positive, neutral or negative overall balance. In order to balance the categories for a single text, translators can work on each category and strategically renounce or retain the Easy Language strategy. To renounce the Easy Language strategy or not to use it to its full extent (for example, to allow for anaphoric pronouns, but to restrict them to certain cases) will influence comprehensibility, but will have a positive effect on other features like acceptability. By using this strategy, translators can try and reach a balance between the single categories. I repeat that the values are based on general theoretical findings and need to be empirically tested.

The values are displayed in the table and discussed below:

Very beneficial:	2 points	(dark green)
Beneficial:	1 point	(green)
Neutral:	0 points	(yellow)
Detrimental:	-1 points	(orange)
Very detrimental:	-2 points	(red)

Category	Nr.	Easy Language Feature	Perceptibility	Comprehensibility	Acceptability	Danger of stigmatisation	Textual coherence	Language economy	Aesthetics	Overall score
Morphology	1.	Segmentation of compound nouns	+1	0	-2	-2	0	0	-2	-5
	2.	Ban on genitive	0	+1	-2	-2	0	-1	-2	-6
	3.	Reduction in verbal tenses	0	+2	-1	-1	-1	-2	-2	-5
	4.	Ban on passive voice	0	+1	0	0	-1	-1	0	-1
	5.	Ban on subjunctive	0	+2	-1	0	-1	-2	-1	-3
Vocabulary	6.	Sacrifice of gender-sensitive language	+1	+1	-1	-1	0	+1	-1	0
	7.	Use of central vocabulary only	+1	+2	-1	-1	0	0	-1	0
	8.	Ban on terminology and foreign words	+1	+2	-1	-1	0	0	-1	0

Category	Nr.	Easy Language Feature	Perceptibility	Comprehensibility	Acceptability	Danger of stigmatisation	Textual coherence	Language economy	Aesthetics	Overall score
	9.	Same concept - same designation	+1	+2	-2	-2	-1	-2	-2	-6
Syntax	10.	Ban on compound sentences	+1	+2	-1	-1	-1	-1	-1	-2
	11.	Standard subjunctions for adverbial clauses	+1	+2	0	0	0	0	-1	+2
Text	12.	Ban on 3 rd person pronouns	0	+2	-2	-2	-2	-2	-2	-8
	13.	Extensive explanations of words and concepts considered peripheral	-1	+2	-2	-2	-2	-2	-2	-9
	14.	Information reduction	+2	+2	-1	-1	+2	+1	0	+5
	15.	Overall explicitness	0	+2	-2	-2	-1	-2	-1	-6

Category	Nr.	Easy Language Feature	Perceptibility	Comprehensibility	Acceptability	Danger of stigmatisation	Textual coherence	Language economy	Aesthetics	Overall score
	16.	Waiver of discourse conventions	+2	+1	-2	-2	0	0	-2	-3
	17.	Each sentence in new line	+2	+1	-2	-2	-1	-2	-2	-6
	18.	Use of typical images	+2	0	-2	-2	-1	0	-2	-5
	19.	Metatextual markers	+1	+2	+1	0	+2	+1	0	+7
	20.	Uniform EL layout	+2	+1	-2	-2	-1	-1	-2	-5

Table 19: Weight of Easy Language linguistic features

Discussion:

Selection of features

The linguistic features are evaluated with regard to their impact on the four basic categories of comprehensibility-enhanced varieties (perceptibility, comprehensibility, acceptability, danger of stigmatisation) and the three textual dimensions 1) contribution to textual coherence, 2) linguistic economy and 3) aesthetics (on the choice of these categories see the introductory remarks in the present chapter).

In addition to the items in the table, there are more features of standard and expert texts that are equally banned from Easy Language, but do not belong to any of the three comprehensibility enhanced varieties. These include the following:

- On the word level, for example, expert language of any kind, including domain-related terminology that is not introduced in the text.
- On the syntactic level, for example, complex phrases of any kind, especially complex noun phrases that are typical for expert texts.
- On the text level, for example, implicatures with regard to expert discourse, extensive reference to other texts whose knowledge is presupposed; asymmetric or otherwise impolite address.

Such features are not included in the table because they are not part of the possible strategies to develop Easy Language Plus on the basis of Easy Language. They are features of expert communication and lead to sharply reduced comprehensibility of the information. As Easy Language Plus is situated between Easy and Plain Language, only such features are taken into account that do not go beyond the complexity of Plain Language.

On the other hand, there are Easy Language features that do not contribute to reduced acceptability and stigmatisation. Such features are usually those that form part of any typical style guide for good writing and are not specific to Easy Language. Such features comprise, for example:

- politeness and adequacy of address
- coherent and transparent argument structure
- adequate text structuring through subheadings and other layout features

Such qualities are also mentioned in Easy Language rulesets and are, of course, also part of Easy Language Plus as well as of any other well-conceived text. They are therefore not expressly part of the instrumentarium to strategically enrich Easy Language towards Easy Language Plus as presented in the table above.

Language-specific and cross-language features

This book is based on findings with regard to the German language. Some of them can be generalised, some are language-specific. The true extent of language-specific or cross-language features can only be identified through future comparative and typological research that adds the profiles of other languages. There might be other language specific categories for other languages that are present in Easy Language because they make texts more perceptible and comprehensible and have an impact on acceptability or the three textual features in the rear columns of the table. These features will have to be explored for each individual language. Such language-specific features might be related to the linguistic system of the respective natural language. In order to formulate regulations on using or avoiding a certain case, there has to be a case system in the respective language. For example, German Easy Language across the guidelines includes a rule to avoid the genitive, as it is often not accompanied by a preposition and has to be identified via morphological features. This rule is language-specific. Such rules might, however, be related to principles that apply across languages: The genitive, for example, is mostly used in complex nominal phrases that represent a hazard to comprehensibility not only in German. The strategies offered to avoid the genitive might therefore also apply to other languages.

Language-specific rules might also be related to the Easy Language conventions with regard to the respective natural language. Some languages, including German, for example, rely on morphological strategies that lead to long words. German, however, is the only language among the Inclusion Europe manuals that prescribes word separations for Easy Language that are not backed by orthography (see Chapter 3.1.1).

Language-specific features in the table are the ban on the genitive, the ban on subjunctive mode, the considerations on verbal tenses and on gender-sensitive language.

In the following sections, I will discuss values attributed to the individual features in the above table and draw conclusions for Easy Language Plus.

Morphology:

1. Segmentation of compound nouns:

Perceptibility +1, comprehensibility 0,
acceptability -2, danger of stigmatisation -2

Impact on ... textual coherence 0, language economy 0, aesthetics -2

Overall score: -5

The segmentation of compound nouns is a language-specific rule for German (see Chapter 3.1.1). It is applied to enable users with below-average reading skills to perceive the boundaries in long compound nouns; the effect on comprehension can be positive, depending on word length and number of compounds (see Baddeley et al. 1975: 577 for an empirical study on word length as an indicator for recall). On the other hand, recent research has shown that the effects of this separation on comprehension might not always be positive as the single lexemes have to be reintegrated semantically (Gutermuth 2020, Deilen 2020, and above, Chapter 1.4.2). The effect on perceptibility remains positive (+1), but comprehensibility is therefore indicated as neutral (0). Especially the separation of lexemes with hyphens where it is not legitimated by orthography tends to trigger strong rejection in the secondary and parts of the primary target groups (see above, chapters 2.4, 6) and may even increase the processing costs of the primary target groups (Gutermuth 2020; on the different factors influencing the processing costs of Easy Language texts see Hansen-Schirra et al. 2020b). It is one of the least acceptable and most stigmatising features of German Easy Language that is felt to have a very negative impact on language aesthetics (the impact on aesthetics being one dimension of stigma, according to Jones et al. 1984). All these categories (acceptability, danger of stigmatisation, aesthetics) therefore score -2. There is no impact on textual coherence nor language economy. Thus in the table the overall score of this feature amounts to -5. This means that the hyphen is a good candidate to work on when trying to balance categories. In Maaß (2015) and Bredel/Maaß (2016a, b), we therefore propose the mediopoint as a more neutral solution (see Chapter 3.3.3, Compound segmentation).

In Easy Language Plus, the mediopoint is usually dispreferred as it belongs to the Easy Language ruleset and therefore signals that a text is part of the Easy Language universe (for the symbolic function of Easy Language, see Chapter 3.4). The mediopoint supports the symbolic function but is not to be used if texts are intended to blend in with the standard. In Easy Language Plus, long compounds can be separated with a hyphen, but strictly within the framework of German orthography.

2. Ban on genitive:

Perceptibility 0, comprehensibility +1,
acceptability -2, danger of stigmatisation -2

Impact on ... textual coherence 0, language economy -1, aesthetics -2

Overall score: -6

The ban on the genitive case is a language-specific rule for German. The German guidelines advise Easy Language translators to use a paraphrase with *von* (“of”) instead: instead of *the teacher’s house* > *the house of the teacher* (see Chapter 3.3.2). The advantage is that the grammatical category is signalled through a free morpheme that is invariable and more visible than the genitive marker that is bound to the noun and comes in various forms. As it is limited to certain forms of use in standard German, the *von*-paraphrase to avoid the Genitive is perceived as typical for Easy Language and often subject to sharp rejection on the part of the secondary target groups. The ban on the genitive and replacing it with a *von*-construction therefore scores very negative on acceptability (-2), danger of stigmatisation (-2), and aesthetics (-2). It has no impact on textual coherence and a slightly negative impact on language economy (-1), as genitive constructions are more concise. On the other hand, there is evidence that this grave toll is not outweighed by considerable gains with regard to perceptibility and comprehensibility: two independently conducted studies have shown that comprehension of phrases with genitives or *von*-paraphrase does not differ significantly in people with cognitive impairments (Lange 2019, Kugele in preparation). In the table, the ban on genitive nonethe-

less receives +1 point for comprehensibility as the genitive is frequently used in complex nominal phrases. In such cases, it is not the genitive itself that poses the problem, but rather the density and abstract presentation of the information. Complex nominal structures are not part of any of the comprehensibility-enhanced varieties and will always have to be resolved. The overall score of the ban on genitive is very negative: -6.

As a consequence for Easy Language Plus, the general ban on the genitive does not seem functional. The genitive will therefore be used in Easy Language Plus; at the same time, measures to reduce nominal complexity remain in place which will reduce the use of the genitive to a minimum.

3. Reduction of verbal tenses:

Perceptibility 0, comprehensibility +2,
acceptability -1, danger of stigmatisation -1

Impact on ... textual coherence -1, language economy -2, aesthetics -2

Overall score: -5

There is ample proof for different languages that irregular verb past tense forms are difficult to process and use for language learners as well as for people with communication impairments (see for example, Rumelhart/McClelland's 1986 neural network model on learning the English past tense, de Zeeuw et al. 2013 for Turkish learners of Dutch, Blom/Paradis 2013 for children with English as a second language with and without impairments).

The option to reduce verbal tenses is language specific: not all languages have multiple past or future tenses, and in many cases, the choice of a tense is stipulated by grammar rather than by considerations of register or style. For German, it is principally possible to forego both future tense and the simple past ("Präteritum"). These two tenses are, thus, usually banned in Easy Language, with the exception of the simple past forms of the copula verbs ("to have", "to be") and modal verbs (such as "can", "may", "must", "shall"). Simple past is preferred in German in certain text types. It is usually not part of oral communication. Many verbs have irregular simple past forms. For Easy Ger-

man language, it is therefore possible to avoid simple past by using exclusively the forms licensed for Easy Language (copula and modals) and to rely on frames that allow for the present tense/present perfect (“It is the year 1525; Martin Luther is...”).

These strategies are laborious and lead to reduced acceptability for some text types (for example, history books, fairy tales); but as the knowledge of those frequently irregular forms cannot be presupposed in the primary target groups, they will have to be avoided for Easy Language Plus as well.

Future tense, on the other hand, is not irregular in German, but is formed with the verb “werden” (“will”). Future tense is avoided in Easy Language because this variety strives for maximum reduction of grammatical features. As it is possible to avoid the future tense, it is often banned from Easy Language. With respect to Easy Language Plus, there is no good reason to renounce the future tense.

With regard to the score, avoiding tenses does not improve perceptibility (0); avoiding the frequently irregular simple past in particular enhances comprehensibility (+2). Acceptability might be slightly affected, especially in text types and genres that usually use those tenses (-1). As especially the simple past is linked to literature and other narrating genres, there is a certain danger of stigmatisation (-1), if those genres are produced without simple past. As subjects and events further behind in the past have to be introduced explicitly via frame-setting (“it is the year 1525...”) and also future events further ahead have to be explicitly separated from the present (“In three years time, ...”), there is potentially a negative impact on textual coherence (-1) and definitely a negative impact on language economy (-2). For the above-mentioned text types and genres, there is also a negative impact on aesthetics (-2). The overall score is, according to this calculation, at -5.

4. Ban on passive voice:

Perceptibility 0, comprehensibility +1,
acceptability 0, danger of stigmatisation 0

Impact on ... textual coherence -1, language economy -1, aesthetics 0

Overall score: -1

This rule is omnipresent in style guides and rulebooks on Easy and Plain Language across languages (see Chapter 3.1), but it has a rather moderate impact with a score of -1 . Differently from the genitive or tense problem, where the actual morphological realisations of the grammatical category can pose a problem, the passive voice is, in Germany and many other languages, an analytical form with a very reduced amount of irregularity and a clear-cut morpho-semantic functionality. Ballstaedt et al. (1981: 207) argue that sentences in the passive voice are in many cases as easy to understand as in the active voice. This has also been proven empirically, for example in File/Jew (1973: 65ff); the authors show, with unimpaired users, that information (here: airline emergency landing instructions) is as easily recalled in active as in passive constructions.

The problems are not morphological, but rather textual-pragmatic: The passive voice is used to conceal the protagonists who are carrying out the actions. Thus, the passive voice poses a problem whenever this knowledge is needed to understand what is really going on, who is responsible, who might be addressed for further help etc. In texts where functionality entails an action-enabling potential, the frequent use of the passive voice might hinder this function from unfolding. On the other hand, there are uses of the passive voice, for example where the main intention is to indicate the perspective of the victim (who “has been injured” in a traffic accident), where to avoid the passive voice would provoke unnatural and clumsy transliterations that might even be detrimental to comprehension.

In the table, the ban on passive voice is neutral in most of the categories: avoiding the passive does not increase nor decrease perceptibility. Comprehensibility is not negatively, but rather slightly positively affected ($+1$). Average readers will presumably not notice its absence, so that there is neither a positive nor a negative impact on acceptability and no danger of stigmatisation; the impact on aesthetics is minimal. Its impact on text coherence and language economy might work out slightly detrimental as some smooth, event- or patient-centred (and not actor-centred), renderings are not available (for example: reporting an accident from the perspective of the victim who “has been hurt”). Its overall score is slightly negative (-1). It is a typical category that can be added in Easy Language Plus while keeping the action-enabling potential in mind.

5. Ban on subjunctive:

Perceptibility 0, comprehensibility +2,
acceptability -1, danger of stigmatisation 0

Impact on ... textual coherence -1, language economy -2, aesthetics -1

Overall score: -3

Much like the simple past, the active and passive mastery of constructions containing the subjunctive belongs to advanced language proficiency levels. Differently from other languages, German can principally do without the subjunctive. The subjunctive is used, for example, in indirect speech and in conditional sentences of the hypothetical and counterfactual types. In oral communication, it is frequently omitted in indirect speech (Günthner 2000). To do without the subjunctive is neutral with respect to perceptibility (0), but considerably increases comprehensibility (+2): The morphological forms of the subjunctive might not be known to the target audience, while counterfactual and hypothetical sentences verbalise what is NOT happening and are, therefore, a rather complex and abstract way of relating facts and events. Texts that avoid the subjunctive mode where it is usually to be expected are very explicit and rely heavily on explanations. They verbalise what might seem all too obvious to the secondary target groups. Therefore, the strategies applied to avoid the subjunctive mode might have an impact on acceptability (-1) but not to the point of triggering stigmatisation (0). The lengthy explanations to circumscribe what is usually said with a conditional sentence may have a negative impact on textual coherence (-1), and it definitely has a considerable impact on language economy (-2). The negative impact on aesthetics is limited (-1) and the overall score reaches -3.

The consequence with respect to Easy Language Plus is that the subjunctive should only be used in very obvious cases for straightforward conditional clauses. It should not be used for indirect speech, as the strategy to replace indirect with direct speech has no negative implications on acceptability and does not increase the danger of stigmatisation.

6. Sacrifice of gender-sensitive language:

Perceptibility +1, comprehensibility +1,
acceptability -1, danger of stigmatisation -1

Impact on ... textual coherence 0, language economy +1, aesthetics -1

Overall score: 0

Gender-sensitive language is, with respect to German, a subject of heated discussions (see Diewald/Steinhauer 2017 and above, Chapter 3.3.3). To avoid double forms (“Liebe Kolleginnen und Kollegen”, “Dear female colleagues and male colleagues”) or forms that are only used in written discourse (“Liebe KollegInnen”) is a means to enhance perceptibility (+1) and comprehensibility (+1) in Easy Language texts. This feature, however, moderately deduces acceptability (-1) and entails the risk of stigmatisation (-1). It has a positive impact on language economy (+1) and is neutral with respect to text coherence (0). Whether gender-sensitive forms add to the beauty of a text is subject to opinion, but they do have an impact on text aesthetics so avoiding them does influence a text (-1). The overall score of this feature is 0 (neutral).

For Easy Language, they can be used in contexts where they do not disproportionately burden the sentence and are concordant with the text functionality. Such forms are to be preferred that have a counterpart in oral discourse; that means, forms that are limited to written discourse, should be avoided.

On the level of morphology, some features are added to the ruleset of Easy Language Plus that are not available for Easy Language in the hope of decreasing the acceptability/stigmatisation issue. Whether the outcome is still comprehensible enough and who might be adversely affected has to become the subject of empirical research.

Vocabulary

7. Use of central vocabulary only:

Perceptibility +1, comprehensibility +2,
acceptability -1, danger of stigmatisation -1

Impact on ... textual coherence 0, language economy 0, aesthetics -1

Overall score: 0

Easy Language is restricted to central vocabulary with no stylistic variation across a single text, while more peripheral parts of the vocabulary are banned (see Chapter 3.3.3). This rule has a positive impact on perceptibility (+1) as it has been proven that the most important factor to prolonging fixation is unknown vocabulary. Just/Carpenter (1980: 337) have shown empirically that unknown vocabulary is the one factor that provokes the longest fixation, the impact of this factor exceeding the factor number of syllables by multiple times (see 3.3.3, compound segmentation). The impact on comprehensibility is even bigger (+2) as words that are not understood severely hamper comprehensibility. The impact of this measure is slightly detrimental to acceptability (-1) and entails a certain danger of stigmatisation (-1) as the texts are perceptibly simple and do not exploit the lexical diversity of a language. It has a negative impact on aesthetics (-1) and is neutral with respect to language economy (0) and textual coherence (0); the overall score is neutral (0).

For Easy Language Plus, the strategy must basically be preserved with only slight modifications with respect to the perimeter of the vocabulary considered as central. It is to be expected that this widening of the perimeter will have positive effects on acceptability, on aesthetics and will reduce the danger of stigmatisation. On the other hand, such measures increase the risk of leaving the parts of the primary target groups behind who lack the knowledge on concepts and do not know all the words used in Easy Language Plus texts.

8. Ban on terminology and foreign words:

Perceptibility +1, comprehensibility +2,
acceptability -1, danger of stigmatisation -1

Impact on ... textual coherence 0, language economy 0, aesthetics -1

Overall score: 0

This rule can be deduced from what has been said with regard to feature 7 above (also see 3.3.3): Most foreign words and terms are not part of the central vocabulary; if they are, they may be used. The category displays, thus, the same score as feature 7: Use of central vocabulary only. Avoiding terminology and foreign words might prove more acceptable and entail a lower risk of stigmatisation than generally using only very central parts of the vocabulary. But terminology is not simply banned from expert-lay communication: it is simply not presupposed as known by the users. That means, feature 8 leads to the avoidance of such terms that were not explained in the text (feature 13). Explanations of words and concepts is a highly problematic category with a score of -9. Therefore, feature 8 has indirect rather than direct negative implications.

For Easy Language Plus, feature 8 is therefore interesting in combination with the rule on the text level, i.e. providing extensive explanations as discussed in 13. Terminology, and vocabulary in general, that has to be explained is a burden on the text level. However, it might be required to fulfill the text function.

9. Same concept – same designation:

Perceptibility +1, comprehensibility +2,
acceptability -2, danger of stigmatisation -2

Impact on ... textual coherence -1, language economy -2, aesthetics -2

Overall score: -6

This rule actually applies to the text level as it concerns anaphoric resumption. It is part of the practical guidelines as well as the scientific rule books (Bredel/Maaß 2016a: 352ff, 2016b: 96f). This leads to extreme term consistency and proves helpful for users with a reduced attention span or reduced grammatical or lexical knowledge (see Chapter 3.3.3, Same concept – same designation). This strategy thus leads to highly consistent texts with high comprehensibility (+2); as the activation level of a recurring word remains high (Bredel/Maaß 2016a: 120), perception is presumably also facilitated, even if this requires a certain attention span that might not be equally present in all users (therefore, +1). On the downside, this strategy leads to texts that are longer, quite repetitive and relatively poor in information. Standard readers tend to find this text quality repelling, so that this feature has low acceptability (-2) and entails the risk of stigmatisation (-2). Textual coherence is reduced in such cases that would demand a third person pronoun (-1; see below, feature 12). What is severely hampered is language economy, as information, that in a standard text would have to be introduced via anaphoric noun phrases, has to be put in a new sentence (-2; see Chapter 3.3.3 and Bredel/Maaß 2016a: 494ff). The lacking variation is detrimental to aesthetics (-2). The overall score is at -6. However, if users have severe communication impairments, the terminological consistency of Easy Language texts is a feature that is very helpful to comprehensibility and cannot be avoided, no matter the negative impact on the other categories.

For Easy Language Plus, some mild modifications can be applied. Personal pronouns may be used, and noun phrases can also be resumed through hyponyms or hypernyms that belong to the close range of vocabulary, which can be assumed to be known by the target audience and are activated by the previous term:

<p><i>Hören Sie auf Ihren Körper: Sie haben beim Sport Schmerzen? Dann hören Sie mit dem Training auf.</i></p>	<p>Listen to your body: You are in pain doing sports? Then you have to stop the training.</p>
--	---

On the level of vocabulary, there is no essential difference between Easy Language and Easy Language Plus. The “basic” words, though, entail a bigger share of the respective language’s vocabulary, leading to more acceptable, yet somewhat less comprehensible outcomes. Anaphoric resumption does not necessarily have to be identical; for Easy Language Plus it is assumed that users tolerate variations to a limited scale. This leads to more acceptable outcomes

that are also more efficient on the text level (language economy) and render more aesthetic results.

Syntax:

10. Ban on compound sentences:

Perceptibility +1, comprehensibility +2,
acceptability -1, danger of stigmatisation -1

Impact on ... textual coherence -1, language economy -1, aesthetics -1

Overall score: -2

There is ample empirical proof as well as practical awareness of the fact that complex syntactic structures are a main impediment to perception and especially to comprehension; to reduce syntactic complexity is a central strategy of all style guides and rulesets of complexity-enhanced languages with metrical comprehensibility research being founded on this very feature as one of its central parameters (see Chapter 3.1.4; for an overview, see Kercher 2013). Easy Language reduces the content of one sentence to one proposition (which is, in the strict linguistic sense of the word, practically impossible) or rather to a main clause structure (see Chapter 3.3.4). In the German context, each main clause is put on a new line in order to enhance the perceptibility of the individual propositions (see Nr 17 in the table and below).

While it is necessary to reduce syntactic complexity as much as is needed in order to reach the primary target groups, the main clause strategy may even prove detrimental even to comprehensibility as sentences have to be reintegrated (Bock/Lange 2017; Fuchs 2019). It is, thus, dilemmatic in Easy Language, where the main balance has to be found between perceptibility and comprehensibility. All categories but the first two are adversely affected by this strategy with a comparatively mild overall score of -2.

The main clause strategy is, thus, only reasonable when addressing severe forms of communication disability or very difficult texts. For Easy Language Plus, the strategy to use only main clauses does not apply in such a generalised

way. On the contrary, Easy Language Plus approves compound sentences with one subordinate clause. The overall proposition load per sentence has to be carefully dosed. Adverbial clauses are to be preferred as the subjunction allows conclusions on the semantics of the sentence.

11. Standard subjunctions for adverbial clauses:

Perceptibility +1, comprehensibility +2,
acceptability 0, danger of stigmatisation 0

Impact on ... textual coherence 0, language economy 0, aesthetics -1

Overall score: +2

The ban on stylistic variation as discussed for feature 9 is not only valid for nouns and verbs, but extends to subjunctions (see Chapter 3.3.3 Same concept – same designation; Chapter 3.3.4, Transforming adverbial clauses; Maaß 2015: 181; Bredel/Maaß 2016b: 105ff). The rule to stick to standard subjunctions has a positive impact on perceptibility (+1) and comprehensibility (+2), while it seems to go largely unnoticed by the readers and is thus neutral in those categories (acceptability 0; risk of stigmatisation 0). It has no effect on textual coherence (0) or language economy (0) and a slightly negative impact on language aesthetics (-1) as the main goal of using different subjunctions is stylistic variation, which contributes to the aesthetic function of language.

The largely positive and, respectively, neutral balance of this feature (the overall score is +2) is a strong recommendation to maintain it for Easy Language Plus.

On the syntactic level, Easy Language Plus retains the policy of keeping subjunctions stable. The variation will, in any case, be larger because some of the most frequent subjunctions are limited to compound sentences and may not be regularly used in main clauses (for German: “denn” = “because”; “weil” = “as”). They are, thus, banned from Easy Language but may well be used in Easy Language Plus, adding to a more natural tone of texts in this variety.

12. Ban on 3rd person pronouns:

Perceptibility 0, comprehensibility +2,
acceptability -2, danger of stigmatisation -2

Impact on ... textual coherence -2, language economy -2, aesthetics -2

Overall score: -8

This rule is particularly dilemmatic as different primary target groups have problems with anaphoric pronouns (“A man ... he”; Chapter 3.3.3, Same concept – same designation). Easy Language, thus, bans those pronouns in favour of an identical resumption of the nouns (“A man ... this man ... the man”) which leads to improved comprehensibility (+2), while perceptibility is not affected (+1), but has a severe impact on all the other categories, culminating in a score of -8.

In our model of Plain Language, where we propose to strategically enrich texts in different categories (Bredel/Maaß 2016a, b), we assume five levels of difficulty:

- 1) No third person pronouns
- 2) Pronouns with an unambiguous anchor
- 3) Pronouns with more than one possible anchor
- 4) Pronouns considerably distant from their anchor
- 5) Pronouns with an ambiguous anchor

Easy Language is limited to level 1; Plain Language is in principle free to choose from those levels of difficulty (with focus on levels 1–4) according to the text function and requirements of the situation, while bearing in mind the overall complexity of the target text with regard to user needs. Easy Language Plus is limited to levels 1 and 2. That is: Personal pronouns may be used, but only with an unambiguous anchor. It is assumed that this measure considerably improves acceptability, contributes to textual coherence and language economy and has a beneficial effect on text aesthetics. On the other hand, personal pronouns pose a problem for the primary target groups; the Easy Language Plus target texts will, thus, not be as comprehensible as their Easy Language counterparts. This explains why the comprehensibility level of Easy

Language Plus is not the same as Easy Language; it is therefore depicted in yellow and not in green in the profile figure (see Chapter 7.1).

13. Extensive explanations of words and concepts considered peripheral:

Perceptibility -1, comprehensibility +2,
acceptability -2, danger of stigmatisation -2

Impact on ... textual coherence -2, language economy -2, aesthetics -2

Overall score: -9

This strategy is closely linked to the strategy to prefer central vocabulary on the word level. If peripheral vocabulary (for example, terminology) is needed, it has to be explained. These explanations are inserts in the text and interrupt the unfolding of the current argument. They make the text longer and, thus, shift complexity from the word to the text level (Chapter 3.3.5; for considerations on complexity levels see Gutermuth 2020 and Hansen-Schirra et al. 2020b). The explanations contain the allegation that the reader does not know the concept. The extensive explanation structure that is characteristic for Easy Language on the text level thus provokes rejection in readers that do not need them. Therefore, this feature greatly contributes to the reduced acceptability of Easy Language texts and enhances the danger of stigmatisation (-2 in both categories). Explanations endanger textual coherence (-2) and are the opposite of language economy (-2); they are not considered aesthetical (-2) and are perceived as being irreconcilable with discourse traditions like expert communication. The overall score is the most negative among all features (-9).

At the same time, explanations of peripheral concepts and terminology are needed in all comprehensibility enhanced varieties, because texts are only comprehensible if the key concepts are understood by the readers.

The way forward for Easy Language Plus is to reduce the number of concepts that are explained. This goes along with the assumption that a larger perimeter of vocabulary can be considered as central in this variety and a greater number of concepts on the text topic are known to the users. Another strategy is to blend explanations into the regular text or to separate them completely in the form of a

glossary or text box. Easy Language, by contrast, makes them perceptibly stand out using indents within the regular text. Easy Language Plus, thus, presupposes a more extensive common ground between text authors and target audience (for this concept, see Clark 1996: 93; an application to Easy Language in Bredel/Maaß 2016a: 187, and Rink 2020: 175ff). This is a solid indication that the audience of Easy Language Plus is not completely identical to that of Easy Language.

14. Information reduction:

Perceptibility +2, comprehensibility +2,
acceptability -1, danger of stigmatisation -1

Impact on ... textual coherence +2, language economy +1, aesthetics 0

Overall score: +5

Easy Language texts often have to select from the inventory of source text information, because to convey the same amount of information as the source text would lead to an excessively long text (Scenario A; see Chapter 3.3.5 and Rink 2020). This strategy leads to more perceptible and better comprehensible texts that simultaneously provide the target audience with the chance to retrace the text message (Scenario C, see 3.3.5, Actively shaping the information structure). This strategy also leads to a reduced number of concepts to be explained and, as a whole, has beneficial effects on the text level. The strategy is neutral with regard to text aesthetics (0). Information reduction in accessible communication is not always well-received: In subtitling, demands from deaf users not to cut out information are frequent as this is felt to be a patronising intrusion on the part of the subtitlers (Perego 2020: 38). The situation in audiovisual translation, however, is special as the source texts remain present in the target situation and deaf users can partly infer what is being said through lipreading and thus expect those words to appear in the subtitle. Information reduction in Easy Language is an issue in audiovisual translation as well (Maaß/Hernández 2020), but much less so for printed texts as readers are rarely also confronted with the source texts. Excessive information reduction will lead to target texts of Scenario B (see Chapter 3.3.5, Actively shaping the information structure) that will have reduced

acceptability. But a moderate application of this feature will supposedly lead to mildly reduced acceptability (-1) and enhanced danger of stigmatisation (-1) and yield a positive overall score (+5).

With regard to Easy Language Plus, this strategy will have to be maintained, but not to the extent of an Easy Language text. Easy Language Plus texts do not reach the information density of a regular text, which, as they should not be considerably longer than the source texts, leads to a lower level of informativity than a regular source text of the same text type. On the other hand, this feature is not as pronounced as in Easy Language and will often go unnoticed by the primary and secondary target groups.

15. Overall explicitness:

Perceptibility 0, comprehensibility +2,
acceptability -2, danger of stigmatisation -2

Impact on ... textual coherence -1, language economy -2, aesthetics -1

Overall score: -6

Easy Language texts bring all sorts of implicatures to the surface (Bredel/Maaß 2016a: 501). This strategy, while being neutral in terms of perceptibility (0), greatly contributes to comprehensibility (+2) as it does not rely on shared knowledge but introduces key concepts of a text. On the other hand, it has detrimental effects on acceptability (-2), makes the risk of stigmatisation rise (-2) and is a hazard to language economy (-2). As it may blur the line of argumentation by the number of additional propositions needed to bring implicatures to the surface, it is detrimental to textual coherence (-1) and it does not contribute to text aesthetics (-1); the overall score is negative (-6).

Easy Language Plus texts are still more explicit than standard texts. They are directed to secure and enlarge the common ground between text sender and text users; making information explicit is an important strategy in achieving this aim. This strategy is used in a less pronounced form than in the case of Easy Language texts. Easy Language Plus texts are oriented more towards regular standard texts with regard to their information structure.

16. Waiver of discourse conventions:

Perceptibility +2, comprehensibility +1,
acceptability -2, danger of stigmatisation -2

Impact on ... textual coherence 0, language economy 0, aesthetics -2

Overall score: -3

Acceptability is particularly low (-2) and the risk of stigmatisation is high (-2) if texts are perceptively different from what is expected based on discourse conventions (for standard conformity as a standard pillar to make Easy Language more acceptable, see Chapter 3.3.2). This comprises all forms of visual design. Easy Language is perceptively different with regard to many features, invariably with the intent of increasing perceptibility (+2) and, as a second step, comprehensibility (+1). To increase perceptibility in many cases reduces acceptability and enhances the risk of stigmatisation, and it also affects text aesthetics as Easy Language texts depart from what is considered “normal” (Maaß 2019a, Hansen-Schirra/Maaß 2020a). This is even more so the case if the feature chosen for Easy Language does not only depart from the regular standard, but expressly infringes on standard rules, for example with regard to orthography (see, for example, the waiver of correct spelling in the case of the hyphenated compounds in German, feature Nr 1). Such choices sharply reduce acceptability. They should be reconsidered with caution, even for Easy Language. As the waiver of discourse conventions aims at enhanced perceptibility and comprehensibility, the overall balance is not excessively negative (-3).

For Easy Language Plus, the strategy is to approach the target texts as closely as possible to the standard expectations. This has a double impact: It will on the one hand reduce the acceptability/stigmatisation hazard and it will, on the other hand, reduce perceptibility, with two possible downsides: As perceptibility is the precondition of comprehensibility, Easy Language Plus texts might not grant access to parts of the primary target groups. This means, Easy Language Plus addresses a slightly different range of people. The second consequence is that Easy Language Plus texts usually do not possess the symbolic function of Easy Language texts (see Chapter 3.4) or only to a limited extent.

As a consequence, Easy Language Plus is not a complete substitute for Easy Language; they are both functional variants that cover different parts of the spectrum of accessible communication.

17. Each sentence in a new line:

Perceptibility +2, comprehensibility +1,
acceptability -2, danger of stigmatisation -2

Impact on ... textual coherence -1, language economy -2, aesthetics -2

Overall score: -6

Along with other Easy Language layout conventions, this feature enhances perceptibility (+2) with the intent of enhancing comprehensibility. This measure keeps lines short, which disburdens the working memory: long lines cause frequent regressions (Tinker 1963: 86); the same is true for line breaks (Bredel/Maaß 2016a: 125f). The sentence level stands out, that is, comprehensibility is enhanced on the sentence level. But on the downside, this negatively influences the meso- and macro-levels, as the single sentences will have to be reintegrated in order to reach the text level. The impact on comprehensibility is therefore not entirely positive (+1). The texts are recognisable as belonging to the Easy Language universe at first glance, and they do not display the regular optics (aesthetics -2), which negatively impacts acceptability (-2) and bears a risk of stigmatisation (-2). The text level is affected with regard to coherence (-1): Readers will have to reintegrate the single sentences in order to reach the coherent whole. This strategy leads to a loose layout with little information on one page (language economy -2). The overall score is -6.

Easy Language Plus does not opt for this layout convention. The texts are closer to the standard texts and therefore have a regular line type. This contributes to Easy Language Plus' higher acceptability and reduced risk of stigmatising the primary target groups, but makes Easy Language texts unfit to fulfil the symbolic function of Easy Language without explicit marking (for example, through a logo). Another downside is that texts are less perceptibil-

ity-optimised, which might be at the detriment of very weak readers or people with visual impairments.

18. Use of typical images:

Perceptibility +2, comprehensibility 0,
acceptability -2, danger of stigmatisation -2

Impact on ... textual coherence -1, language economy 0, aesthetics -2

Overall score: -5

Images can be helpful to activate previous knowledge that can then be synchronised with the verbal content (Schnotz 2014); they can also exemplify some aspects of a text. Images can be perceived holistically even by weak readers that do not process text in the same holistic way as experienced readers (Bredel/Maaß 2016a: 271). They can be helpful in activating context-related meanings of polysemous words that would otherwise have to be identified by reading. Moreover, they address readers on an emotional scale.

The use of the typical imagery (see Chapter 1.4.2), though, makes Easy Language texts stand out from the standard and is one of the major contributors to the acceptability/stigmatisation issue (-2 on both categories; see also Chapter 6). It is questionable whether those images contribute to comprehensibility at all (or to what extent; 0) as they contribute to erasing distinctive features of text types and are therefore not helpful for comprehension on the text level (-1 for text coherence). As they are nonlinguistic, they do not impact language economy. They do contribute to retrievability and might have a positive impact on the motivational barrier for some parts of the primary target groups. Their main role is to underline the symbolic function as they situate the texts unequivocally in the domain of cognitive disabilities; the overall score is -5.

The use of images that are not typical for a text type or discourse tradition is not recommended for Easy Language Plus. The texts will have to be layouted and underpinned with a visual language that is conform with the standard texts, but with the accessibility features prescribed, for example, by the Web Content Accessibility Guidelines for all kinds of online texts.

19. Metatextual markers

Perceptibility +1, comprehensibility +2,
acceptability +1, danger of stigmatisation 0

Impact on ... textual coherence +2, language economy +1, aesthetics 0

Overall score: +7

Metatextual markers are the feature with the most positive score in the list. Such markers are used to expressly tag the offer as accessible or give information on how to handle a text. Metatextual markers can be

- Logos that tag the text as an Easy Language offer (on the symbolic function of Easy Language logos, see Chapter 3.4).
- Advance organisers: They provide information on the macro-level of a text, on its main ideas and function. Psychological comprehensibility research has shown empirically how useful advance organisers are for text comprehension (Christmann/Groeben 2019: 132).
- Indicators on the text boundaries: Accessible communication offers are often embedded in non-accessible communication offers. A typical example is an Easy Language text embedded in a standard language website or containing hyperlinks to standard-language texts. Such hyperlinks should not appear unintroduced in Easy Language texts, but have to be highlighted by a metatextual marker:

You want to know more about [subject x]?

Then you can click this link.

Attention: The linked page is not in Easy Language.

- Elements with explanations that stand out typographically like info boxes (Bredel/Maaß 2016a: 269).
- Explanations on the language used: Explanations that the text is in Easy Language, that only the male form is used (see Feature 6 above).

- Information on further information on the subject and indications on how the material can be retrieved or contact information for service personnel and information whether the service is accessible.

Such information is very helpful to comprehension at the text level (+2) and contributes to the action-enabling potential of a communication offer. As such information often stands out visibly, it moderately enhances perceptibility (-1). To be transparent with regard to their functions, aims and address makes those texts more acceptable; the stigmatisation potential is low (0). Metatextual markers greatly contribute to textual coherence (+2) and moderately to language economy as they give important structural information using comparatively little space (+1). They usually do not adversely affect text aesthetics. The overall score is positive (+7) which makes it an excellent candidate to retain for Easy Language Plus.

20. Uniform Easy Language layout:

Perceptibility +2, comprehensibility +1,
acceptability -2, danger of stigmatisation -2

Impact on ... textual coherence -1, language economy -1, aesthetics -2

Overall score: -5

This last row comprises all layout features of Easy Language that comprise uniformity with regard to font type, line spacing, imagery etc. They are all aimed at increasing perceptibility with the intent of enabling better comprehensibility. The German Easy Language conventions go to extremes in this respect, which leads to reduced accessibility and an enhanced risk of stigmatisation. Those strategies delete layout features that give hints on text type and text function; in unimpaired children, the faculty to deduce information on the text content on the basis of such features is developed in primary school (Augst et al. 2007). Schuppener/Bock (2019) and Bock/Lange (2017) point to the fact that Easy Language text users have firm concepts for many text types and functions even if they have poor reading skills. This suggests that the uni-

form layout, even if helpful to perception on word and sentence levels, is actually detrimental to text coherence and, therefore, comprehensibility on the text level. The uniform layout usually leads to more space being consumed for less information, language economy is therefore adversely affected (-1). And because they separate Easy Language texts from the standard, they are often perceived as less aesthetic (-2); the overall score is -5.

Easy Language Plus follows the general strategy already indicated in 16 and 17 to converge as much as possible with the standard, even at the detriment of perceptibility. This strategy might exclude parts of the primary target groups as they need perceptibility enhanced texts in the version advocated by the Easy Language rules. This does not apply to online offers in accessible websites: according to the WCAG 2.0 (1.4.8 Visual Representation), a text has to be resizable without assistive technology which makes this feature less problematic. Standard layout, however, disturbs the symbolic function of Easy Language that prefers differentness from the standard. And it might make retrievability more difficult for the primary target groups.

On the text level, Easy Language Plus comprises some major changes compared to Easy Language: Anaphoric pronouns are readmitted, even if only some forms are to be used. There are fewer explanations in the text and they are not inserted as indented paragraphs but are introduced either in a more casual way as part of the sentence or separated from the text in form of infoboxes or glossaries. What remains is the approach to strategically choose from the information of the source text to an extent that is deemed suitable for the situation and the intended users. The amount of information conveyed in one page of text will, however, be bigger than for Easy Language, due to the layout regulations that situate Easy Language Plus texts fairly close to the standard.

All these strategies lead to enhanced acceptability and a lower risk of stigmatisation, mainly at the detriment of perceptibility and the symbolic function of Easy Language. Easy Language Plus leaves parts of the primary target groups behind and is therefore not a substitute for Easy Language as such, but rather complements it for certain uses and text types.

7.3 An example for Easy Language Plus

The example discussed in this chapter is taken from the online pages of the Apotheken Umschau, a website with about 9 million users and almost 40 mil-

lion page impressions per month. The Apotheken Umschau is published by the Wort und Bild Verlag (wortundbildverlag.de; this website is also the origin of the figures reported here). The printed version appears monthly in almost 9 million copies that reach 27 per cent of the German population age 14+. The comprehensibility enhanced texts are, for now, limited to the online offer, even though this reduces retrievability for parts of the target groups (see Chapter 5).

The texts are labelled as “Einfache Sprache” (“Plain Language”), but they are, with regard to the linguistic ruleset applied, quite close to Easy Language – with the exception of the layout features that are close to standard texts and some other features (see below). The offer is directly accessible via the homepage: as a tab at the top of the page or via the buttons in the service area (see arrows):

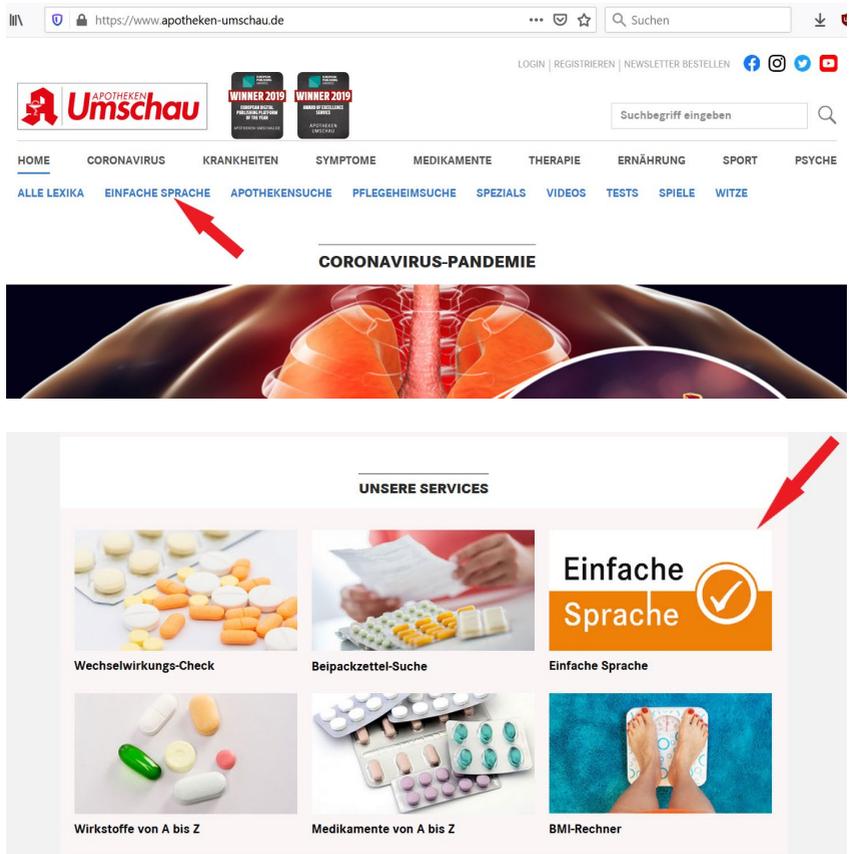


Figure 24: Homepage of “Apotheken Umschau”, www.apotheken-umschau.de, 08.05.2020

The comprehensibility-enhanced texts are executed as part of a research project with the Research Centre for Easy Language under the direction of Isabel Rink. This project is intended to shape guidelines for an enriched version of Easy Language defined as Easy Language Plus in this chapter and in Maaß (2019a) and Hansen-Schirra/Maaß (2020a). At the same time, the project generates a corpus of health information texts in Easy Language Plus that is, to this day, the biggest in the German-speaking area: The text corpus comprises several hundred texts and is constantly being enlarged. All texts are controlled by medical experts to ensure their correctness. The project is a response to the findings of Schaeffer et al. (2018) that disclose the insufficient health literacy of considerable parts of the German population (Schaeffer et al. 2016, 2017) and call for Plain Language health information as part of a solution (Schaeffer et al. 2018; see Chapter 2.3.2). Currently, text- and user-centred research is being conducted to explore perceptibility, comprehensibility, recall and acceptability of these texts in comparison with standard texts and texts that have the full range of Easy Language features.

All texts have the same structure. They can be accessed via a landing page, are in alphabetical order and come with a small teaser text. Each text contains a black-and-white photographic or drawn image that is related to the respective syndrome as well as a reduced form of the “Comprehensible Language”-Logo of the Research Centre for Easy Language:

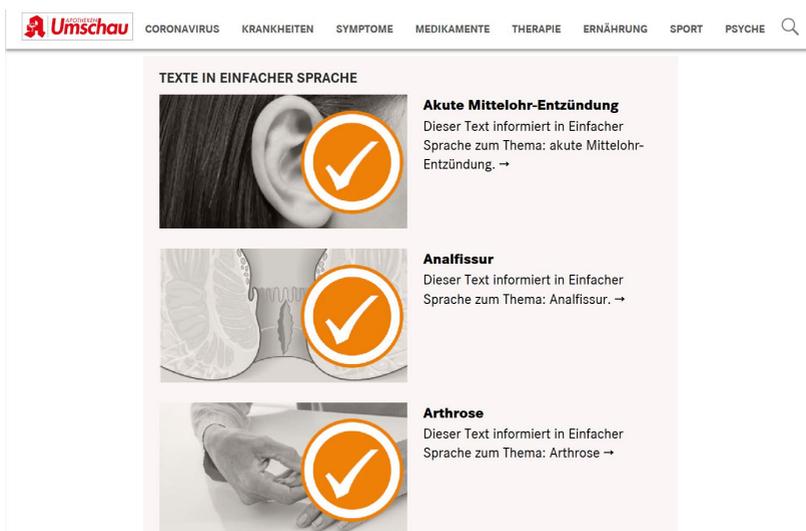


Figure 25: Text overview, apotheeken-umschau.de/einfache-sprache

Gloss translation:

TEXTS IN PLAIN LANGUAGE

Acute middle ear infection

This text informs you in Plain Language on the topic: acute middle ear infection →

Anal fissure

This text informs you in Plain Language on the topic: anal fissure →

Arthrosis

This text informs you in Plain Language on the topic: arthrosis →

All texts start with a heading, a reference to its comprehensibility-enhanced format and a list of the chapter headings in the form of questions that can be used for direct navigation as they are linked to the respective chapters.

The screenshot shows the website 'www.apotheeken-umschau.de'. The navigation bar includes 'CORONAVIRUS', 'KRANKHEITEN', 'SYMPTOME', 'MEDIKAMENTE', 'THERAPIE', 'ERNÄHRUNG', 'SPORT', and 'PSYCHE'. The main heading is '→ THEMA: MITTELOHRENTZÜNDUNG-AKUT' followed by 'Akute Mittelohr-Entzündung'. Below this, it states 'Dieser Text informiert in Einfacher Sprache zum Thema: akute Mittelohr-Entzündung.' and the date '27.01.2020'. There are social media icons for Facebook, Twitter, and email. A list of navigation questions is provided:

- ↓ [WAS IST EINE AKUTE MITTELOHR-ENTZÜNDUNG?](#)
- ↓ [WAS PASSIERT BEI EINER AKUTEN MITTELOHR-ENTZÜNDUNG?](#)
- ↓ [WORAN KÖNNEN SIE EINE AKUTE MITTELOHR-ENTZÜNDUNG ERKENNEN?](#)
- ↓ [WAS SIND DIE URSACHEN EINER AKUTEN MITTELOHR-ENTZÜNDUNG?](#)
- ↓ [WAS KÖNNEN SIE BEI EINER AKUTEN MITTELOHR-ENTZÜNDUNG TUN?](#)
- ↓ [WO BEKOMMEN SIE NOCH MEHR INFORMATIONEN?](#)

Figure 26: Typical first part of each comprehensibility enhanced text, www.apotheeken-umschau.de/akute-mittelohr-entzuendung/einfache-sprache

Gloss translation:

Acute middle ear infection

This text informs you in Plain Language on the topic: acute middle ear infection.

27.01.2020

- ↓ WHAT IS AN ACUTE MIDDLE EAR INFECTION?
- ↓ WHAT HAPPENS IF YOU HAVE AN ACUTE MIDDLE EAR INFECTION?
- ↓ HOW CAN YOU TELL WHETHER YOU HAVE AN ACUTE MIDDLE EAR INFECTION?
- ↓ WHAT ARE THE CAUSES OF AN ACUTE MIDDLE EAR INFECTION?
- ↓ WHERE CAN YOU GET FURTHER INFORMATION?

The form of the questions suggest that the text will provide answers and, thus, enhance the action-enabling potential. The comprehensibility enhanced texts have the same layout as the standard source texts. This even extends to the capital letters in the subheadings. To put words in capital letters is usually banned from Easy Language as there is evidence that they are more difficult to read, even for experienced readers (Tinker 1963: 65). In the project, it was decided to favour equality of layout between source and target texts over perceptibility in the effort to make the comprehensibility-enhanced texts as acceptable as possible. On the other hand, this strategy is only moderately applied and there are also moves to make text elements more comprehensible: The Easy Language Plus project texts contain comprehensibility-enhanced figures and charts that are expressly developed when the standard text versions are considered to be too hard to understand. These visuals are reused across the individual texts for comparable content promoting the intertextual connection between the single texts. This is a gain for perceptibility and comprehensibility. The high-quality visuals are also beneficial for acceptability.

This is an example of how the categories perceptibility/comprehensibility on the one hand and acceptability/risk of stigmatisation on the other hand are weighted and balanced in the project.

Was ist eine akute Mittelohr-Entzündung?

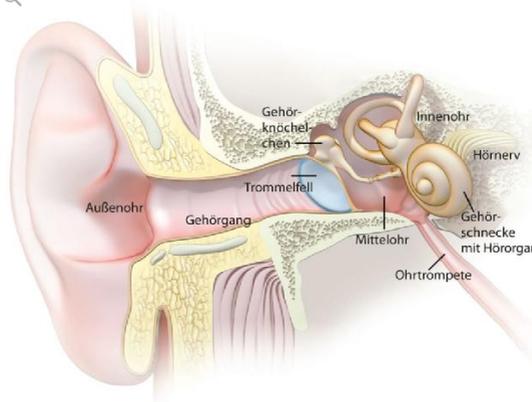


Bei einer akuten Mittelohr-Entzündung haben betroffene Personen starke Ohrenscherzen. Das Mittelohr ist dann nämlich entzündet. Das Mittelohr ist hinter dem Trommelfell im Ohr. Oft sind Personen mit einer akuten Mittelohr-Entzündung zugleich erkältet. Kleine Kinder haben besonders oft eine akute Mittelohr-Entzündung.

Was passiert bei einer akuten Mittelohr-Entzündung?



Manchmal kommen Krankheitserreger vom Rachen ins Ohr. Das können zum Beispiel Bakterien oder Viren sein. Dann kann sich das Mittelohr entzünden. Das Mittelohr ist zwischen dem Trommelfell und der sogenannten Ohrtrompete. Die Ohrtrompete ist die Verbindung zwischen dem Mittelohr und dem Nasen-Rachenraum. Eine akute Entzündung im Mittelohr verursacht starke Ohrenscherzen.



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Figure 27: Text on “acute middle ear infection” under the first two subheadings; www.apotheken-umschau.de/akute-mittelohr-entzuendung/einfache-sprache

Gloss translation:

What is an acute middle ear infection?

In the case of an acute middle ear infection, the affected person has a severe ear ache. This is because the middle ear is inflamed. The middle ear is behind the eardrum inside the ear. Persons affected by a middle ear infection often have a cold. Small children are particularly frequently affected by a middle ear infection.

What happens if you have an acute middle ear infection?

Sometimes germs enter the ear through the throat. These can be bacteria or viruses. In such cases, the middle ear can become inflamed. The middle ear is between the eardrums and the so-called auditory tube. The auditory tube is the connection between the middle ear and the nose and throat. An acute infection of the middle ear causes severe ear ache.

Picture inscriptions: outer ear; ear canal; ear drum; auditory ossicle; middle ear; auditory tube; ear snail with organ of Corti; hearing nerve; inner ear

With respect to the features in 7.2, the text shows the following profile:

Morphology:

- 1. Segmentation of compound nouns:** The project texts use the hyphen to segment long compound nouns, but only within the framework of German orthography. In our example: “Mittelohr-Entzündung” (“middle ear infection”) is separated with a hyphen, while “Schilddrüsenunterfunktion” (“underactive thyroid”) is not separated because of the joint element “n” in “SchilddrüseNunterfunktion”. Compound nouns consisting of three compound elements will only have one hyphen: “Magenschleimhaut-Entzündung” (“gastritis”, literally: “stomach lining inflammation”).
- 2. Use of the genitive:** The genitive is used in the texts, for example to indicate causes of a condition or a symptom or a relation: “Das Abwehrsystem des Körpers” (“the body’s immune system”, text: “Akute Mittelohrentzündung” = “Acute middle ear infection”)
It is, however, avoided if the results with *von*-paraphrase are acceptable, as in “weil die Schilddrüse **von** der Mutter nicht richtig arbeitet” (“because the thyroid gland **of** the mother does not work properly”, text: “Schilddrüsenunterfunktion” = “Underactive thyroid”, emphasis added). Complex nominal constructions that might contain genitives do not appear in the target texts.
- 3. Reduction of verbal tenses:** The use of verbal tenses in the project texts complies with Easy Language in the strict sense. This can be mainly attributed to the discourse conventions and functionality of this type of text and the target texts show no blatantly different profile than the source texts in this respect.
- 4. Passive voice:** The texts use the passive voice abundantly, again in concordance with the functionality of the texts: symptoms or inflammations have to be treated, organs are potentially damaged, patients are operated on etc. The texts are, on the other hand, very explicit with regard to contact persons or otherwise responsible personnel in order to secure the action-enabling potential of the texts.

5. **Ban on subjunctive:** Due to the text subject, the texts do not contain indirect speech or hypotheticals.
6. **Sacrifice of gender-sensitive language:** The introductory remarks to the text offer contain a disclaimer with regard to gender-sensitive language – only the masculine forms are used in the individual texts. In contrast, the source texts use the “gender asterisk”: “Unsere Inhalte sind von Ärzt*innen und Pharmazeut*innen überprüft” (“Our content is checked by male and female doctors and pharmacists”, for example here: www.apotheken-umschau.de/magen/gastritis).

On the level of morphology, the modifications with regard to the Easy Language ruleset are very moderate. The most stigmatising feature (word segmentation with hyphens) is restricted to standard language use, genitive and passive are moderately used. With respect to the other features, the project texts adhere closely to the Easy Language rules.

Vocabulary

7. **Use of central vocabulary only:** The text uses central vocabulary, but the range of word material goes well beyond what would be admissible for Easy Language and with far fewer explanations added: terms like “Krankheitserreger” (“pathogens”), “Wiederbelebungsmaßnahmen” (“resuscitation procedures”) or “Schutzfunktion” (“protective function”) are presupposed and not explained in the text. However, such less central or complex lexemes are not frequent in the texts.
8. **Ban on terminology and foreign words:** Wherever possible, the text prefers the German equivalent and tries to avoid the Latin or Greek term. This can be briefly demonstrated on the basis of the example presented above. The source text introduces the terms in the text: “eine akute Entzündung im Mittelohr (Otitis media)” (an acute inflammation of the middle ear [otitis media]) or “die sogenannte Ohrtrumpete oder Eustachische Röhre” (“the so-called auditory tube or Eustachian tube”, www.apotheken-umschau.de/Mittelohrentzuendung-akut). The comprehensibility-enhanced target text, on the other hand, uses only the German counterparts whose meaning is more transparent. In many cases they are, however, not expressly explained beyond the level of the source text.

9. **Same concept – same designation:** The translation project relies on thorough terminology management. That is, the same concepts are rendered with the same designations throughout the platform. On the other hand, the anaphoric resumption is more liberal and allows for some moderate forms of variation:

- **Variation in the compound type:** “Im Alltag kann es zu verschiedenen **Verletzungen der Muskeln** kommen. Es gibt drei Arten von **Muskelverletzungen**” (“In everyday life, different **injuries of the muscles** may occur. There are three kinds of **muscle injuries**”) (www.apotheken-umschau.de/muskelfaserriss-muskelzerrung/einfache-sprache)
- **Use of close synonyms:** “Erkrankung” > “Krankheit” (“illness”, “disease”, both of them containing the lexeme “krank” = “ill”)
- **Use of hypernyms that share lexemes:** “Schutzhülle” > “Hülle” (“protective case” > “case”); “Nierenbecken-Entzündung” > “Entzündung” (“inflammation of kidney pelvis” > “inflammation”). Anaphoric resumption via hypernyms without shared lexical material are mostly avoided: the type “inflammation of kidney pelvis” > “disease” is dispreferred.

At the word level, the texts are quite challenging. They still remain considerably below the level of the source text, but the range of vocabulary used without explanation is perceptibly larger than for an average Easy Language text. There are some modest forms of variation. All these strategies lead to a much greater acceptability of the texts with the high level of comprehensibility potentially going unnoticed by many readers.

Syntax

10. **Ban on compound sentences:** As far as sentence complexity is concerned, the project texts do not deviate from the Easy Language rule set. The texts stick to a pure independent clause structure with almost no subordinate or coordinate clauses. The overall syntactic complexity of the texts is as low as in average Easy Language texts. The difference between source text and target texts is particularly big in this respect.

11. Standard subordinations for adverbial clauses: The texts do not contain adverbial clauses in the strict sense, as the texts do not have complex sentences. Rather, they stick to the Easy Language rule of preferring subordinations or connectors that can be used in independent clauses and using the same connectors all the time to indicate the same kind of semantic relation.

While the rules on the level of morphology are slightly enriched and the vocabulary to an even greater extent, the syntactic rules apply the Easy Language ruleset. The cautious approach with regard to syntax is strategic: it inhibits too sharp an increase in overall linguistic complexity. This strategy also extends to some aspects of the text level as will be shown in the following section.

Text level

12. Ban on third person pronouns: The ban on third person pronouns usually has a strong impact on the acceptability and aesthetics of the text. In the project texts, third person pronouns are used, but only to a very limited extent. In most cases, the project texts adhere to the strategy of resuming nominal phrases with the same lexical forms over and over again: “because **the middle ear** is inflamed. **The middle ear** is behind the eardrum inside the ear.” (see text sample cited above). While the ban on anaphoric pronouns heavily burdens acceptability, it is, at the same time, an important asset for comprehensibility. The translation strategy in the project chooses to reduce the use of anaphoric pronouns to a minimum and to opt for the Easy Language rules here instead. This leaves a margin for more complexity in other fields that is used for lexical variety.

13. Extensive explanations of words and concepts: The project texts presuppose the knowledge of terms that would necessarily have to be explained in an Easy Language text like, for instance, “Trommelfell” (“eardrum”), “Rachen” (“pharynx”), “verursachen” (“induce”) in the text sample cited above. Excessive explanations are very positive for comprehension on the word level, as they set new concepts that are necessary to understanding the text. At the same time, they have a very poor score in all the other categories. The tendency towards extensive explanation is the Easy Language feature with the most negative impact. To work on this category improves the overall score for the project texts; however the negative impact of this measure on comprehensibility has to be taken into account: Easy Language

texts are no longer accessible to parts of the primary target groups that need the explanations in order to access the text content.

14. **Information reduction:** Information in the project texts is substantially reduced with regard to the source texts. This quality has a positive overall score and is retained. The texts are still informative enough for the users to form concepts on the text content. With regard to the information level, the project texts are approaching the idealised scenario C as described in Chapter 3.3.5.
15. **Overall explicitness:** Comparable to category 12, the project texts do not display the level of explicitness of an Easy Language text. This makes them much more acceptable, but on the other hand also less comprehensible. It remains to be tested with the primary target groups whether the level of explicitness is sufficient for them to comprehend and recall the text content.
16. **Waiver of discourse conventions:** The project texts stick to the discourse conventions with regard to the text type. They replicate the layout of the source texts and are not especially perceptibility-enhanced. Acceptability is therefore high for those texts, but at the potential detriment to perceptibility and, as a consequence, comprehensibility. In those categories, Easy Language Plus does not reach the level of Easy Language.
17. **Each sentence on a new line:** Consequently, this feature is not retained in the project texts, with positive results for all categories but perceptibility and, to a lesser extent, comprehensibility. Empirical research is needed to quantify the impact of this category for the individual primary target groups.
18. **Use of typical images:** The project texts do not contain the images that are typical for German Easy Language. This greatly contributes to their acceptability and makes them blend in with the standard texts on the same page and of the overall text type. It has a negative impact on retrievability and perceptibility.
19. **Metatextual markers:** The project texts use the whole range of metatextual markers. As I stated above, the Easy Language Plus texts are marked with a logo. There is a landing page with explanations on the project and the text function:

Einfache Sprache

Auf dieser Seite finden Sie alle Texte in Einfacher Sprache im Überblick.

AKTUALISIERT AM 12.06.2020



Liebe Leserin, lieber Leser,

hier finden Sie Informationen über verschiedene Krankheiten und Beschwerden. Die Informationen sind in Einfacher Sprache geschrieben. So sind die Texte besonders verständlich. Alle Menschen sollen sich nämlich über medizinische Themen informieren können.

Hinweis: In unseren Texten in Einfacher Sprachen benutzen wir oft nur die Wörter für Männer. So sind die Sätze nämlich kürzer und die Texte sind besser lesbar. Zum Beispiel benutzen wir nur das Wort Arzt. Ein Arzt kann aber auch eine Ärztin sein.

Gloss translation:

→ Topic: Diseases

Plain Language

On this page you will find an overview of all texts in Plain Language.

Dear female reader, dear male reader,

Here, you will find information on different diseases and symptoms. The information is written in Plain Language. This makes the text very comprehensible. We want all people to be able to inform themselves on health subjects.

Note: In our texts in Plain Language, we often use only words for men. This way, the sentences are shorter and the texts are easier to read. For example, we use the word “Arzt” (male doctor). But a doctor can also be female.

Each text contains an advance organiser that gives information on the macro-level as well as a table of contents that makes the text structure transparent. Transitions into the standard text offers are expressly marked:

Wo bekommen Sie noch mehr Informationen?



Sie wollen noch mehr über Arthrose lesen? Mehr Informationen über Arthrose finden Sie [hier](#). Achtung: Dieser Link führt aus unserem Einfache-Sprache-Angebot heraus. Die Informationen sind dann nicht mehr in Einfacher Sprache.

Achtung: In diesem Text finden Sie nur allgemeine Informationen. Der Text ersetzt den Besuch beim Arzt nicht. Nur ein Arzt kann Ihnen genaue Informationen geben. Sie fühlen sich krank? Oder Sie haben Fragen zu einer Krankheit? Dann sollten Sie immer zum Arzt gehen.



Die Texte haben wir zusammen mit der Forschungsstelle Leichte Sprache geschrieben. Die Forschungsstelle Leichte Sprache ist an der Universität Hildesheim.

Where can you get more information?

You want to know more about arthrosis? You can find more information on arthrosis [here](#).

Attention: This link leaves the Plain Language text offers. The information there is no longer in Plain Language.

Attention: In this text, there is only general information. The text does not replace the visit to the doctor. Only the doctor can give you detailed information. Do you feel sick? Or do you have questions about a disease? Then you should always see a doctor.

[Logo] We have written these texts together with the Research Centre for Easy Language. The Research Centre for Easy Language is at the University of Hildesheim.

20. Uniform EL layout: The layout of the project texts is identical to the source texts with the exception of some comprehensibility-enhanced visuals. They are, however, consistent with the aesthetics of the standard text offer.

With regard to the text level, the project texts follow a mixed strategy: They widely retain features like the ban on anaphoric pronouns or the information reduction policy, but renounce with strategies that heavily influence the text level like extensive explanations or all layout features and imagery.

To summarise, the project texts actively seek for a balance between the categories displayed in Table 19. The strategies with regard to the language levels are different: on the level of morphology, only the most stigmatising Easy Lan-

guage features are rejected. On the lexical level, the texts are more demanding and offer information even to average readers. This impact on comprehensibility is outweighed by a severe syntax policy that keeps the project texts very close to the full instrumentarium of Easy Language. On the text level, the grammatical features are again close to Easy Language, while the layout features tend towards standard language. All in all, the texts avoid high risk strategies with regard to acceptability. At the same time, features are retained that are less noticeable and not as connected to Easy Language but still suited to enhancing comprehensibility. Some features that are not covered by the standard (non-compliance with orthography, the genitive, use of images and layout) are avoided.

The strategy to upgrade vocabulary and keep syntax short and simple is in line with the proposal in Bredel/Maaß (2016a: 527) for expert texts (in that publication on the example of a vocational exam). Texts that are not linked to an expert domain might opt for another strategy that, for example, sticks to a tight range of vocabulary while allowing for compound sentences with no more than one subordinate clause. The hypothesis is that the overall complexity might be the same in both cases (see Guterath's 2020 Kapa model).

8 Conclusion and outlook

In this book, I gave an outline of accessible communication, its potential value and its forms. I discussed the terminology in the field and the legal foundations using the example of Germany. In the first half of the book, I described the two main varieties used to provide access that are established on the market: Easy Language and Plain Language. I emphasised the advantages and disadvantages of the two varieties with regard to the four leading, yet seemingly incompatible qualities perceptibility/comprehensibility and acceptability/stigmatisation potential.

I described what makes communication accessible: it has to be retrievable, perceptible, comprehensible, linkable, acceptable and action-enabling. Communication products have to meet all these requirements in order to empower the users to act on the basis of given information. The relation between these different requirements are dilemmatic and actions taken to improve one of these requirements may incur damage for another. Furthermore, the different linguistic rules to produce comprehensibility cannot be simply added up:

- That which is helpful for perception might disturb comprehension.
- That which facilitates understanding at the level of vocabulary might compromise the text level.
- That which enhances perceptibility and comprehensibility may have harmful effects on acceptability and even enhance the stigmatisation risk for the primary target groups.

The problem is further aggravated if guidelines use regulations that oppose established text and language practice. Some of the practical guidelines leave the domain of correct orthography or text type traditions in favour of enhanced perceptibility and comprehensibility. Such texts are a menace to the acceptability of Easy Language and, at the same time, their actual benefit for comprehension remains questionable.

It must be supposed that the degree of the potential stigmatisation caused by Easy Language depends on the conceptual marking and visual design of the communicative products. I have argued that the stigmatisation potential is enhanced if the texts openly diverge from and challenge the standard text and

discourse conventions, especially with regard to their aesthetic qualities both on the linguistic level and the layout level, or adequacy in address. If the primary target groups are addressed asymmetrically in a patronising and condescending way, this adds to the stigma of their condition. If texts with such a design are displayed in public, those qualities receive an official legitimisation, which might prove harmful to inclusion. There is, thus, a great need for well-executed texts.

I also highlighted the needs and sensitivities of the different parts of society involved in the process and effort of communicative inclusion. There are insecurities towards people with communication disabilities and how to address them, communicate with them and understand their needs. There may also be resistance and rejection with regard to communication impairments and making it visible through publicly displayed accessible communication products.

This outcome might make the project of communicative inclusion seem like a rocky road full of pitfalls. But the journey is worth the venture: Though there are difficulties, there is also a great willingness to explore the challenges and make inclusion possible. And the groups in need of accessible communication are much larger than one would expect. We have to open our minds to new target groups like old-aged people whose special requirements with respect to retrievability and their media habits have not yet been in the focus. Or to people with communication difficulties that are not caused by disability, like migrants or other language learners and people with below-average reading skills. At the same time, we must not lose sight of the primary target group that started the Easy Language movement: people with cognitive impairments, and their special needs. Nor the other people with communicative impairments like hearing impairments, aphasia, autism or neurological diseases like dementia-type illnesses. The primary target groups benefit from Easy Language because they gain access to content; thanks to the presence of Easy Language texts they also gain visibility in society. This symbolic function of Easy Language is not unproblematic and comes at a price.

Other groups that use Easy Language, and who are rarely considered, are domain experts that need Easy Language and, in general, accessible communication in order to do their work in cooperation with the primary target groups, who assume the roles of their clients, students or colleagues. The needs of the domain experts have so far not been attended to, even though they give new perspectives on media realisations, target situations and ways of raising awareness.

In this book, I have shown how access to communicative inclusion can be achieved for the different groups:

- how legal foundations help set the framework for communicative inclusion in a society;
- that awareness of the target groups' needs and the conditions of accessibility have to be raised among the professional players and tendering authorities;
- how a market for text producers and their clients (primary target groups as well as tendering authorities or enterprises) can develop, which is a very important precondition for a professionalisation of the area;
- which are the pitfalls with regard to text qualities, implementation processes, and discourses around disability and inclusion.

The book dealt with the different roles in this play – text producers and text users, among them primary target groups, domain experts and organisational users, but also the majority society in their role as bystanders, that are often indirectly addressed and develop attitudes toward Easy Language and other forms of accessible communication. It shows that it is not a promising strategy to force Easy Language, or, more generally communicative inclusion on the majority society, ignoring their attitudes and red lines. Communicative inclusion tends to work better if it is achieved consensually.

An important precondition to achieve consensus is to professionalise the text production processes as a high professional competence is required to produce well-executed, functional texts that are adequate and helpful in the respective target situations.

Accessible communication products that are displayed in public spaces might be expensive if carried out professionally; but non-professional versions often prove problematic and may entail collateral damage for the target groups, as they enhance the danger to incite stigmatisation processes. The book shows that accessible communication involves the whole society. It is not expedient to affront the majority society with unacceptable communication products. Badly executed Easy Language texts may potentially inflict damage on the primary target groups. Additionally, such texts may prove not helpful (and are consequently not being used) as they are not functional in the intended target situations.

Perceptibly different Easy Language texts that were executed in processes that include the primary target groups (for example, in the role of text assessors) do not only have the function of enhancing comprehensibility. They also have a symbolic function: They are a token of the inclusion-friendliness of the organisations, public authorities and enterprises that publicly display such texts, for example on their websites. The symbolic function should, however, be executed in a way that facilitates acceptability by the majority society.

The book has focussed on the situation in Germany in order to be as concrete as possible and to display a genuine situation. Therefore, it is in part illustrative. On the other hand, I tried to point out what is potentially transferable to other countries and languages. This is, for example, true with regard to the layout conventions, that are only in part language-specific and allow for application to other languages and situations. But it is also true for many rules at all linguistic levels, as the principles of comprehensibility are linked to human comprehension which is not language-specific. The concrete solutions for Easy Language are illustrated using the example of German, but they are transferable to other languages. Further results in terms of concrete implementation are needed.

The present book proposes to balance perceptibility/comprehensibility on the one hand and acceptability/stigmatisation potential on the other. It proposes Easy Language Plus (EL+) as a solution. Easy Language Plus is also modelled with respect to German and departs from strategically-enriched Easy Language: EL+ systematically renounces the most problematic features of Easy Language. It is therefore somewhat less comprehensible and perceptible (as the texts are closer to the standard), but much more acceptable. The proposed Easy Language Plus model is a flexible system that can be applied according to the needs of the target situation. It does not make Easy Language obsolete, as it is not comprehensible enough for all target groups. On the other hand, it is much more comprehensible than the average Plain Language text.

To use varieties with different comprehension levels has long been demanded by research and practice. Easy Language Plus, just like Easy and Plain Language, are instruments of communicative accessibility. They all have their fields of application and help meet the vastly different needs of complex and heterogeneous societies. At the same time, they profit from the growing knowledge in the area of easy-to-understand varieties: We have a better understanding of the aims of Plain Language and how domain experts can be enabled to craft adequate communication products without expecting them to become accessible communication professionals. We are getting more insight

into the potential, but also the risk of Easy Language. Of course, it is not in the intention of translators, activists or tendering authorities to contribute to the stigmatisation of the target groups, but such processes happen far too often. The book discloses the mechanisms at work. Easy Language Plus is a proposal to balance the main qualities. This means, the balancing as formulated in the title of the book, is a property of Easy Language Plus. The other two can only achieve approximations to such balance.

This book, thus, is only partly on balancing comprehensibility and acceptability in the strict sense and more on understanding mechanisms and tensions of this antithetic relation of the two concepts.

Making communication accessible is a challenge, but also a gain: If people with diverse needs obtain access to content without difficulties, this saves effort and time for everyone. Well-executed accessible communication products can promote inclusion and are a gain for everyone. Patience and effort is needed, as well as research and good practices. If users can expect high-quality accessible communication products that are useful to people in professional and non-professional roles in different target situations, the demand for such products increases and the stigmatisation potential decreases. But we have to deliver first, and we have to deliver consistently and reliably: it is too early to look at click counts of online information and to conclude that offers that are not immediately used can be discarded. If we want people to expect communication products, we need a vast public presence of high-quality accessible communication products with media realisations that are adapted to target situations and users. These products will not appear by accident, but can only be created by trained professionals. Accessible communication, such as Easy Language texts, requires a professionalisation turn. This will take time. Prerequisites are inclusion discourses in society, a firm legal ground, more awareness of the hazards and the complexity of the task. Research will have to contribute from a multidisciplinary and international perspective. This requires networks that are currently in the process of being created. Previous relevant research, for example, comprehensibility research or translation studies, has rarely been conducted with the primary target groups of Easy Language. It is a major desideratum to include these groups as objects and subjects of research, depending on methodology and scientific discipline. The results from this research has the potential to positively influence practical translation and text work. This interaction is what will drive accessible communication and promote the concept.

In the field of practical application, there is already a tendency to differentiated education and training paths with a focus on academic as well as non-academic professionalisation. People with and without communication impairments are taking part in this process: in the roles of users and clients, of experts and trainers, translators and assessors, researchers and activists.

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