

## Analysis of Six Randomly Selected CRS Forms

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The following report includes the results of an analysis of six randomly selected CRS forms. We have divided the information into two parts: readability scores from Visible Thread (AI Software) and a comparison of all six form that includes additional plain language best practices.

### 1. Results of AI Software

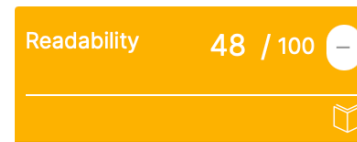
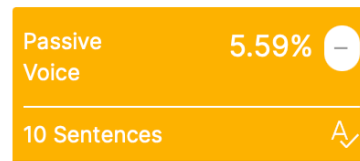
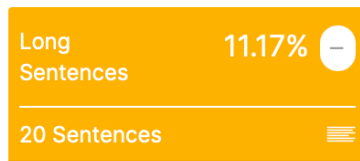
- **Passive Voice:** Using passive voice often obscures who is responsible and who took or takes action. The passive voice is wordier, harder to understand, and adds unnecessary complexity. Aim for 4% or lower
- **Long Sentences:** For easy reading and to not overload member, sentences should contain 15-20 words maximum. Aim for 5% or lower for the number of longer sentences.
- **Readability:** The Flesch Reading Ease scores go from 1-100 with the higher scores indicating easier reading. The standard best practices is a score of 60-70 though 50 is acceptable. To better understand what these scores mean, here is a chart that compares scores with common reading material. The colors indicate how well or how poorly each CRS form met best practices.

• **green = meets well**

• **yellow = moderately meets**

• **red = does not meet**

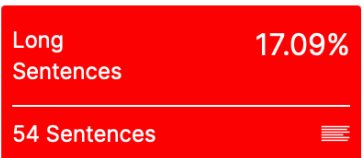
#### 1. Ameriprise



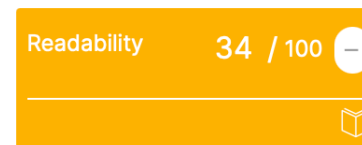
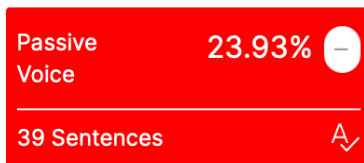
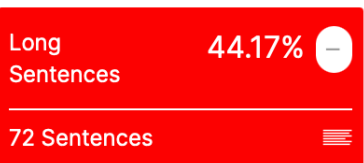
## 2. Commonwealth



## 3. Equitable Advisors



## 4. Royal Alliance



## 5. Sage Point Financial



## 6. Wells Fargo



### Comparison with Best Practices

Using the *SEC Plain English Handbook* (1998) and additional best practices since it was first published, I analyzed the following randomly selected CRS Forms for common problems. In general, we look at several elements to determine the quality of plain language writing.

- **green** = meets the standard well
- **yellow** = moderately meets the standard
- **red** = does not meet the standard

The percentages indicate what percent of the text includes long sentences (higher than 20 words) and passive voice.

Company	Long Sentences	Passive Voice	No Jargon	Pronouns	Friendly, Helpful	Visual Format	Readability
1. Ameriprise	11.7%	5.59%					48
2. Commonwealth	28.77%	13.01%					35
3. Equitable Advisors	17.09%	8.54%					40
4. RA	44.17%	23.93%					34
5. Sage Point Financial	42.68%	23.78%					34
6. Wells Fargo	42.68%	23.78%					34

### Conclusions

The over-riding issues shared, in general, by the six forms include the following:

- Too much information crammed on each page.
- Too many long sentences and long paragraphs.
- Too much passive voice.
- Small typeface typeface (one is only 8 pt) – makes it difficult for older readers and regulations generally require 10 pt.
- Lack of visual appeal that leads to people not wanting to read the CRS.
- Financial jargon (“discretionary investment authorization,” “investment authority”) without explanations.