Amplifi's Multi-Level Comprehension Framework©

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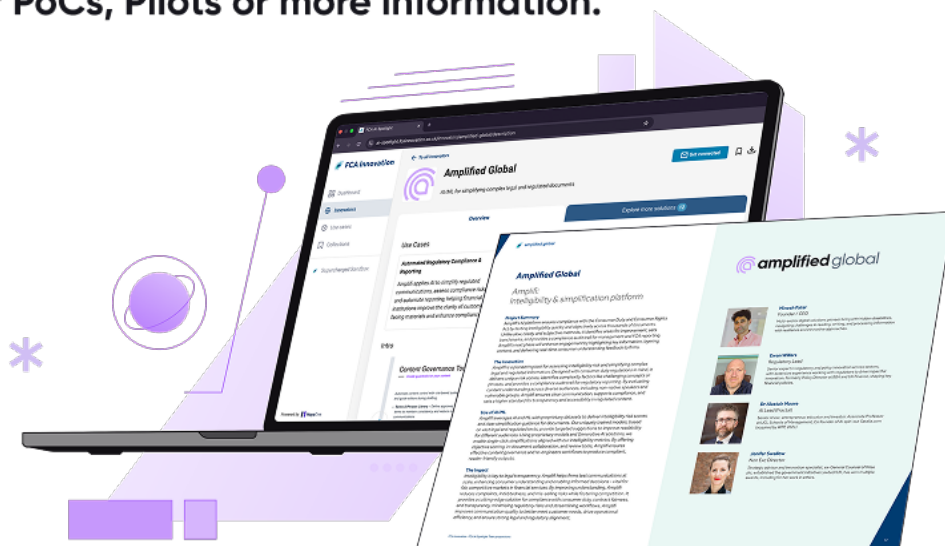
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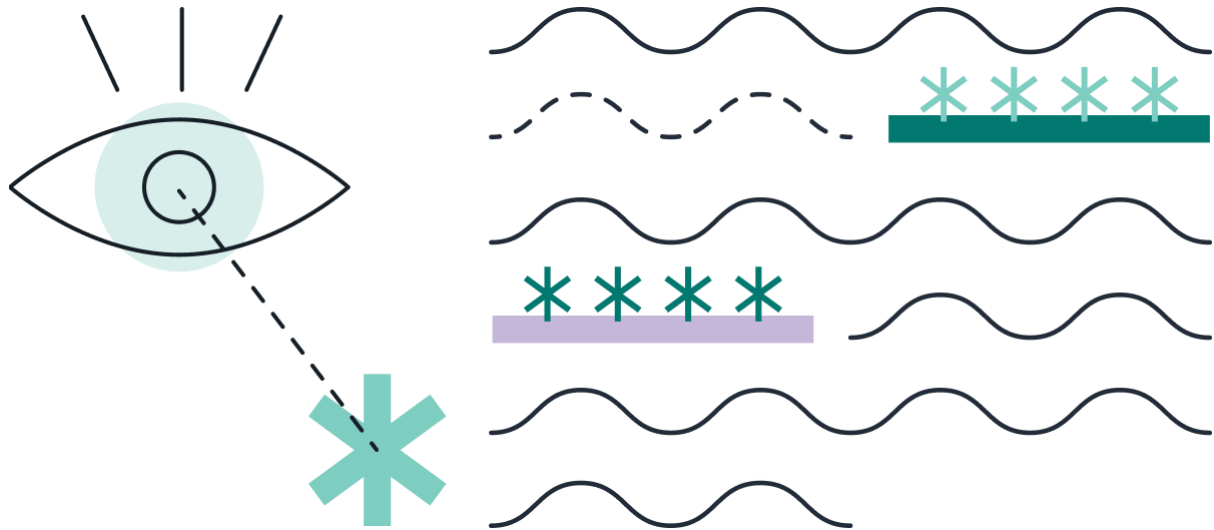

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Introduction

Understanding how consumers understand financial and legal documents is crucial for promoting transparency, trust, and responsible decision-making. These documents, such as credit agreements, insurance policies, and privacy notices, often involve complex language and significant consequences. When consumers misinterpret or fail to understand them, the results can include financial harm, legal risk, and broader social inequities.

Simply providing information is no longer enough; traditional assumptions that reading equals understanding are outdated, especially given how dense and opaque these disclosures often are. To truly protect consumers, we must go beyond compliance, and ensure that people genuinely comprehend their rights and obligations.

Policymakers, institutions, and consumer advocates need data-driven tools to evaluate how well current practices support understanding, design more accessible communication, and adapt to diverse needs. That's why we need a better, empirically grounded framework for assessing consumer comprehension, one that can shape clearer documents, more equitable protections, and a more informed public.

Past Challenges with Comprehension Assessment

The Consumer Duty requires that firms test whether information is likely to be understood, and whether consumers receive good understanding outcomes in practice. But based on previous experience, efforts to measure comprehension have relied on simplistic techniques, such as asking readers to identify a document's main idea or answer basic recall questions. These approaches fail to capture whether readers can interpret, apply, or reflect on information in meaningful ways.

Key Challenges:

Recall ≠ Understanding

Remembering a fact doesn't mean grasping its application or understanding.

Misaligned Assessments

Tests often ignore how consumers interact with content in real-world contexts—where **application** and **decision-making** are critical.

Overreliance on Plain Language Certifications

Documents bearing "Plain Language" marks may still include ambiguous terms and confusing structures.

False Confidence

Consumers may feel confident in their understanding while misinterpreting crucial terms, especially in numerically or legally complex content.

Financial and legal comprehension involves navigating conditional logic, understanding risks, and calculating outcomes. Current assessments rarely test these advanced capabilities, giving a misleading impression of comprehension.

Developing the Amplifi Multi-Level Comprehension Framework

To address these shortcomings, Amplifi designed a framework grounded in the function of each document. Rather than applying a one-size-fits-all approach, the framework is tailored based on:

The purpose of the document or section

The actions or decisions the document is intended to support

For instance, a paragraph on repayment terms must be understood well enough for the reader to determine costs under different scenarios, while a disclosure of rights may only require basic awareness.

Once these objectives are identified, they are conceptually mapped to different levels of comprehension. Not every section of a document will require all levels to be achieved. The levels are chosen based on what a typical reader must understand in order to follow the instructions, make informed decisions, or comply with obligations.

This approach allows for flexibility. A simple notification might require only one level of comprehension, while a section on more complex legal and financial concepts may necessitate deeper understanding. The goal is not to impose a rigid structure, but to match the assessment to the real-world demands the document places on its reader.

In practice, this means comprehension assessments can be adapted from document to document.

The FCA's recent use[1] of the Amplifi Multi-Level Comprehension Framework in two major publications demonstrates its growing influence in regulatory research and policy development.

In the research note Reading between the lines: Understanding of targeted support in retail investments (2025, p 13), the FCA assessed comprehension using the Amplifi Comprehension Framework, applying measures such as testing readers' understanding of the main message, ability to recall key information, interpreting and applying knowledge, and their confidence in decision making.

Similarly, in the consultation paper CP25/17: Supporting consumers' pensions and investment decisions: proposals for targeted support (2025, p 167), the FCA explicitly structured its comprehension testing and evaluation using Amplifi's framework.

This is further validation that the framework can meaningfully assess consumer understanding beyond basic recall and inform evidence-based policy.

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[1] **CP**: https://www.fca.org.uk/publications/consultation-papers/cp25-17-supporting-consumers-pensions-investment-decisions (p.167)

Research Note: https://www.fca.org.uk/publications/research-notes/research-note-reading-between-lines-understanding-targeted-support-retail-investments (p.12 and p.30)

How does Amplifi's Multi-Level Comprehension Framework differ from Bloom's Taxonomy

Bloom's Taxonomy is a framework developed[2] in the 1950s to classify learning objectives according to levels of cognitive complexity. It is widely used in education to design curriculum, structure assessments, and guide learners from foundational knowledge toward higher-order thinking. The revised taxonomy includes six hierarchical levels:

Remember — **Understand** — **Apply** — **Analyze** — **Evaluate** — **Create**

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[2] Krathwohl, D. R. (2002). A revision of Bloom's taxonomy: An overview. Theory into practice, 41(4), 212-218.

The framework assumes that learning happens in structured, instructor-led environments and progresses linearly from lower-order to higher-order skills.

Where It Is Used

Bloom's Taxonomy is primarily used in:

Schools and universities for lesson planning, assessment design, and educational outcomes.

Professional training programs that involve classroom-based instruction.

Curriculum development in academic and vocational settings.

It is not specifically designed for assessing how consumers understand documents or make decisions outside educational contexts.

Why a Different Approach Is Needed

While Bloom's Taxonomy is suited to classrooms and guided learning, the Amplifi Multi-Level Comprehension Framework was created for independent users engaging with complex, often unfamiliar documents such as legal or financial terms where understanding needs to be immediate, actionable, and outcome-driven.

Key differences between Amplifi Multi-Level Comprehension Framework and Bloom's Taxonomy

Item	Bloom's Taxonomy	Amplifi Multi-Level Comprehension Framework
Primary Purpose	Educational curriculum design and assessment	Real-world comprehension of legal/financial documents
User Context	Learners in structured educational environments	Consumers navigating regulatory or decision-critical information
Focus	Cognitive development and learning objectives	Practical understanding, self-efficacy, and actionable decision-making
Output of Interest	Mastery of academic concepts	Effective navigation, interpretation, and application of financial/legal content

Table 1 . Purpose and Orientation

Amplifi Multi-Level Comprehension Framework is designed to match the function and practical demand of real-world documents (see Table 1). Rather than being hierarchical or universal, the levels are selectively applied depending on what users must do with the content. This structure allows for more flexible and relevant testing, especially in consumer settings where the stakes involve financial or legal outcomes.

Amplifi's Multi-Level Comprehension Framework Demonstration

The Amplifi Multi-Level Comprehension Framework was developed specifically to support comprehension testing on the Solicitors Regulation Authority (SRA) regulation and guidance. This is SRA Regulatory Guidance explaining how solicitors can provide more flexible 'unbundled' services, used in the Solicitors Regulation Authority (SRA). We worked with the SRA staff who used the Amplifi Tool[3] to simplify the document:

Document	Intelligibility Score
Original Unbundling Guidance	49
Simplified Unbundling Guidance	67

Table 2. Intelligibility scores.

The documents were selected due to their regulatory importance, and because they were intended to be read by solicitors, but also other staff working in legal firms, and consumers.

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[3] https://amplified.global/amplifi-what-is-intelligibility https://amplified.global/amplifi-product-overview

The aim was to assess not just whether readers retained information, but whether they could interpret, apply, and reflect on it effectively, which are key components of intelligibility in a legal and regulatory context. The five comprehension levels are presented in Table 3.

Level	Intelligibility Score
Main Message	Identifying the primary message or central idea conveyed in the document, understanding the overarching purpose or theme of the content.
Basic Recall	Recalling fundamental details from the document, identifying key facts, events, or information presented in the text.
Inference	Inferring or interpreting the meaning behind the information presented, analysing the text to understand implicit messages, intentions, or implications.
Applied	Applying the information from the document to a specific task or real-life scenario, transferring knowledge and using it in practical situations.
Reflection	Reflecting on the content of the document and its relevance or significance, encouraging critical thinking and deeper analysis of the material.

Table 3. Presents the multi-level comprehension framework for intelligibility.

Amplifi's Multi-Level Comprehension Assessment Results

To test the effectiveness of this framework, two core criteria were used:

1. Information Completeness

2. Information Accuracy

These measures the degree to which a reader has demonstrated a comprehensive understanding of a subject or topic without significant gaps or omissions.

Responses were evaluated using a 3-level scale:

Basic Level

The reader's answer covered the essential points but lacked additional depth or context.

Mid-Level

Information indicated a more thorough understanding, including essential elements alongside relevant points.

Expert Level

Information was extensive, demonstrating a complete and accurate understanding of the subject matter.

We found that the simplified Unbundling document consistently outperformed the original version across all comprehension levels (except basic recall, where scores were similar), as viewed in Figure 1.

The most significant gap lies in the performance on applied comprehension tasks. Participants who read the simplified Unbundling Document outperformed those who read the original Unbundling document.

The Simplified Unbundling Document improved performance as it reduced cognitive load through simplification. This was in part achieved by reducing complex terminology and presenting information in a more straightforward and concise way, making it easier to process the information.

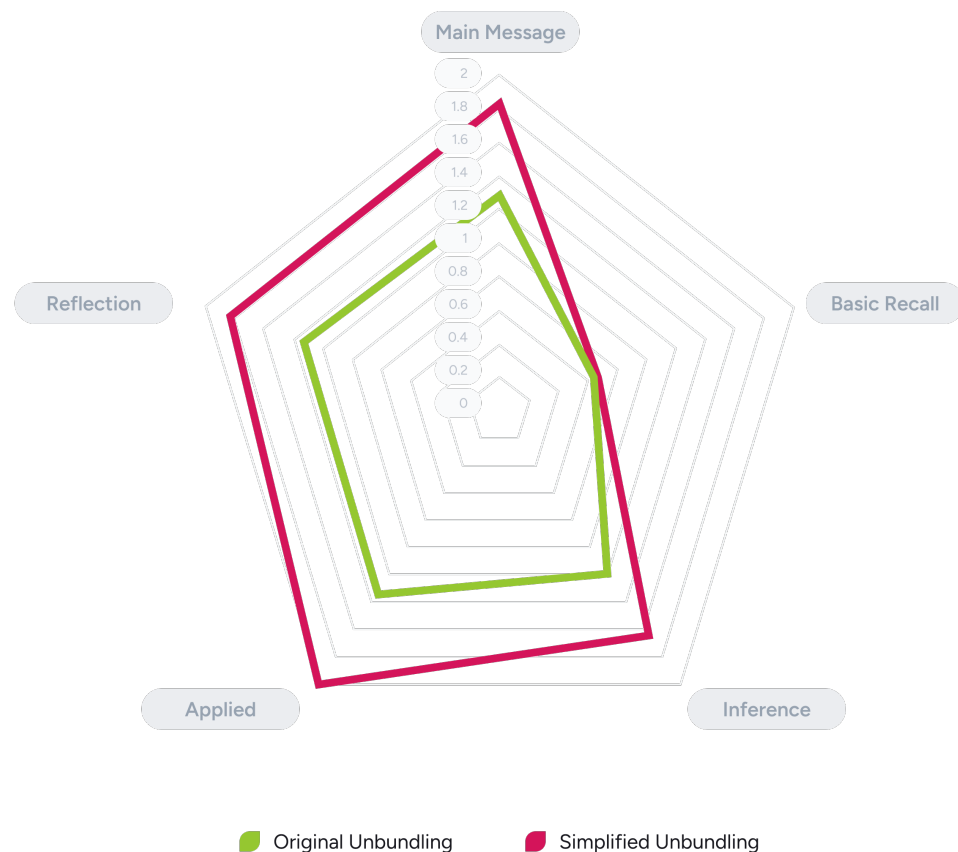## Original and Simplified Unbundling Document

Figure 1. Illustrates the multi-level comprehension framework used to evaluate participant comprehension of the documents.

Amplifi's Multi-Level Comprehension Framework

Amplifi's Multi-Level Comprehension Framework represents a robust and practical tool for improving how financial and legal content is tested and delivered.

Support Regulatory Compliance

The Amplifi Multi-Level Comprehension Framework aligns well with regulatory expectations and provides a robust basis for improving consumer understanding and trust.

To maximise its value:

Align Testing to Document Purpose

Use different comprehension levels based on what each section of a document aims to achieve, some may only require recall, others demand applied understanding or reflection.

Focus on Actionability

Go beyond surface recall. Measure whether users can confidently use the information to make choices, solve problems, or interpret implications.

Diagnose Comprehension Failures

Poor performance at the applied or reflective levels signals a need for content revision, simplification, reformat, or clarification where necessary.

Integrate into Development and Review

Use the framework during product development, user testing, and compliance assessments. This ensures intelligibility.

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Thank you.

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