

# EDUCATION LAW ASSOCIATION WRITERS' QUICK STYLE GUIDE

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## Definitions in This Guide

**West's *Education Law Reporter*** = Published by the West Group of Thomson Reuters, the *Education Law Reporter* (ELR) compiles education law court cases and commentaries on significant topics in the field. ELR uses some unique style conventions with several deviations from the *Bluebook*. ELA abbreviates this publication name as Educ. L. Rep. in our materials. The Yearbook and ED LAW Update are comprised of cases sourced in *Education Law Reporter*, so it's important to know the citation style differences.

**Advance sheets** = As with all of West's Reporter series, the ELR is published every two weeks in a softbound edition referred to as the advance sheets. The content of every two or three advance sheets is then issued in hardbound volumes. West distributes pdf versions of these advance sheets to ELA 2–3 times a month (prior to distribution of the softbound print edition) listing cases that will be published in ELR. We convert them to Word docs with correct BB citation format (as of June 30, 2021) and distribute to ELA writers. Prior to this, advance sheets were in the hybrid Bluebook and West style as issued by West.

**Bluebook or BB** = *The Bluebook, A Uniform System of Citation* (currently 21st edition), focuses on citations rather than text.

**Regular type** = Upper and lower case typeface (generally, ELA specifies Times New Roman font for manuscripts)

**SMALL CAPS** = Font style also called large and small caps. Use "small caps" function under Font (SMALL CAPS). If you can't do this, use regular type—do not use all caps or try to duplicate small caps with more than one font size.

**En and em dash** = En dash (–) is longer than a hyphen (-), shorter than the em dash (—), and both are considered symbols (while the hyphen is on the regular keyboard).

**Ordinal numbers** = No superscript is used for ordinals in citations (9th Cir., 3d Cir.); ordinals are spelled out in text (Ninth Circuit, Third Circuit).

## Writers' Resources

Because ELA uses Bluebook style, it is important that all writers have access to that information. The latest edition is the 21st; some rules have changed from previous editions. Although this style guide has samples of correct abbreviations and spellings used by ELA, much greater detail is found in the Bluebook. Authors should consult the Bluebook for citation rules not covered in this guide.

The ELA Yearbook and periodicals are closely aligned with West's *Education Law Reporter*, as West provides the advance sheets sent to all ELA writers and ELA provides editorial material to ELR. We don't require writers to subscribe to ELR; however, it is important that writers who use Westlaw/ELR as primary resources understand the differences between West style and ELA style.

**The following links provide additional, more detailed information:**

Peter W. Martin, *Introduction to Basic Legal Citation*, Cornell University Law School, Legal Information Institute

<http://www.law.cornell.edu/citation>

American Bar Association, 10 Tips for Better Legal Writing

<http://www.americanbar.org/news/abanews/publications/youraba/2019/april-2019/10-tips-from-legal-writing-experts>

# CITATIONS

## Basics of Bluebook Footnote/Endnote Citation Used by ELA

**Case names in regular type**, but if a complete sentence is used somewhere within the citation, italicize and spell out the case name like text usage. Also italicize shortened case names (e.g., *Tinker*), signals, *ex rel.*, *In re*, *Id.* Correct abbreviations in explanatory phrases are: *aff'd*, - *aff'd mem.*, - *aff'd on other grounds*, - *aff'd on reh'g*, - *cert. denied*, - *cert. granted*, - *reh'g granted [denied]*, - *rev'd*, *rev'd on other grounds*, - *rev'd per curiam*, - *aff'g* and *rev'g* (last two are not followed by a comma, the rest are)

**Abbreviate** the word “and” as “&” and almost every word 8+ letters in the case name using BB tables, even if the word is the first word in a party’s name, unless the name is the only word for the party, or it is a word not abbreviated (see abbreviation tables). Rule 10.2.2 states “Always abbreviate any word listed in table T6, even if the word is the first word in a party's name, unless the word is part of a state, county or other geographical unit that is the entire name of the party.”

**Replace** “on behalf of” “next friend to” and similar phrases in case names with *ex rel.* in italics.

**Spaces** between nearly every abbreviation in the citation (except F.2d and F.3d and certain state abbreviations), including between single capital letters and longer abbreviations (F. Supp. 3d, D. Mass.).

**Circuit court** references use 2d and 3d instead of 2nd and 3rd, with no superscript for ordinal numbers 1st–11th in citations.

**SMALL CAPS** for constitutions, books and reports, periodicals, authors’ names for books (not periodicals), internet sources referencing periodicals, and EDUC. L. REP. when citing articles (not cases).

**Period** at the end of every citation, including internet sources.

**Parallel citations to West’s Education Law Reporter** cases are used in ELA publications’ footnotes, abbreviated as Educ. L. Rep. (West uses Ed.Law Rep.) following a comma. [Brackets] are no longer used.

## Samples of Bluebook Citation Style

### Court Cases

- Case citations should include the name of the case, where it can be found, the court deciding the case, and the year it was decided. See Table 1 of the BLUEBOOK for a list of courts by jurisdiction.
- Cases should be cited to the official reporter or to a statutorily authorized reporter, when available, followed by parallel citations to unofficial reporters if doing so would improve access. Westlaw may be cited for cases that have not yet been officially published or for unpublished decisions.

Jauquet v. Green Bay Area Catholic Educ., 996 F.3d 802, 389 Educ. L. Rep. 702 (7th Cir. 2021).

Dervishi *ex rel.* T.D. v. Dept. of Spec. Educ., 846 F. App’x 10, 389 Educ. L. Rep. 728 (2d Cir. 2021).

Martin *ex rel.* C.M. v. Hermiston Sch. Dist. 8R, 499 F. Supp. 3d 813, 389 Educ. L. Rep. 823 (D. Or. 2021).

A.L. *ex rel.* L.L. v. Chi. Pub. Sch. Dist. No. 299, 2011 WL 5828209 (N.D. Ill. 2011).

Fuhrman v. Mailander, 248 A.3d 387, 389 Educ. L. Rep. 889 (N.J. Super. Ct. App. Div. 2021).

Henry v. Bd. of Sup’rs of La. Cmty. & Tech. Coll. Sys., 313 So. 3d 1009, 389 Educ. L. Rep. 986 (La. Ct. App. 2021).

- Pinpoint citations, a.k.a. pincites, should be used to reference a particular page when you refer to something specific or directly quote from a court opinion.

Peltier v. Charter Day Sch., 384 F. Supp 3d 579, 587, 367 Educ. L. Rep. 941 (E.D.N.C. 2019)

- Short forms can be used for pinpoint citations once you have cited an opinion in full. *Id.* can be used if the full citation immediately precedes the pincite.

Jauquet v. Green Bay, 996 F.3d at 804.

Jauquet, 996 F.3d at 804.

*Id.* at 804.

## Constitutional Provisions

- Citations to constitutions include the name followed by the subdivision being cited.

U.S. Const. art. I, § 9, cl. 2.

Ark. Const. of 1868, art. III, § 2 (1873).

## Statutes and Regulations

- Citations to federal statutes and regulations should include the title number, the abbreviated name of the code volume where it can be found, the section number, and the year the code volume was published.

Every Student Succeeds Act, 20 U.S.C. §§ 6301–8601 (2018).

Family Educational Rights and Privacy Act, 20 U.S.C. § 1232g (2018).

Americans with Disabilities Act, 28 C.F.R. §§ 35.101-36-608 (2019).

- Citations to state statutes and regulations vary from state-to-state but most include the abbreviated name of the code, the chapter and section number, and the year. Due to state variability, authors must check the BLUEBOOK Table 1 for accuracy.

MASS. GEN. LAWS ch. 71B, §§ 1-16 (2007).

603 MASS. CODE REGS. § 46 (2010).

## Periodicals

- Citations to articles in periodicals should include the full names of all authors, the article's title (in italics), volume number of the periodical, abbreviated name of the periodical (in small caps), the first page number, and the year of publication.

Jennifer Butwin, *Children are Crying and Dying While the Supreme Court is Hiding: Why Public Schools Should Have Broad Authority to Regulate Off-Campus Bullying "Speech,"* 87 *FORDHAM L. REV.* 671 (2018).

Kathleen Conn, *Salvaging and Separating the 2020 Title IX Regulations,* 386 *EDUC. L. REP.* 557 (2021).

Dana Goldstein & Tariro Mzezewa, *Doubts, Anger and Anxiety: What It's Like to Go to School Now,* *N.Y. TIMES* (Aug. 15, 2021), at 43.

## Books, Monographs, Pamphlets, Reports, Treatises, etc.

- Citations to books include the full names of all authors (in small caps), the title of the book (in small caps), and the year. Include the section or page number, if applicable.

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JUSTIN DRIVER, *THE SCHOOLHOUSE GATE: PUBLIC EDUCATION, THE SUPREME COURT, AND THE BATTLE FOR THE AMERICAN MIND* 334 (2019).

MARTHA MCCARTHY, SUZANNE ECKES, & JANET DECKER, *LEGAL RIGHTS OF SCHOOL LEADERS, TEACHERS, AND STUDENTS* (8th ed. 2018).

THE NATIONAL COMMISSION ON EXCELLENCE IN EDUCATION, *A NATION AT RISK: THE IMPERATIVE FOR EDUCATIONAL REFORM* (1983).

## Internet sources

- Internet source citations should include the author's name, the title of the article (in italics), the publisher of the website, the date posted (n.d. if no date is indicated), and the url.

Monica Anderson, *A Majority of Teens Have Experienced Some Form of Cyberbullying,* Pew Research Center (Sept. 27, 2018), available at <https://pewrsr.ch/3kBTJs0>; see also Justin W. Patchin & Sameer Hinduja, *Tween Cyberbullying in 2020* (Oct. 7, 2020), available at <https://tinyurl.com/3pfn8xtf>.

Jeanine Santucci, *Mask Mandates Cause Chaos at School Board Meetings. Some Parents Say It's 'a Matter of Life and Death.'* *USA TODAY* (Aug. 15, 2021), available at <https://www.usatoday.com/story/news/nation/2021/08/15/school-mask-mandates-spark-protests-parents-covid-cases-rise/8124375002>.

## Bluebook Tables of Abbreviations

### Abbreviations Used in Case Names in Citations

- The *Bluebook* requires that commonly understood words be abbreviated in case names. The full list of case name abbreviations is in Table 6 of the *Bluebook*. The chart below lists words most often used in education cases that should be abbreviated. Add an “s” to abbreviations for plurals, e.g. Schs., Trs. Words of eight letters or more that are not listed in Table 6 may be abbreviated if the result is unambiguous.

Academ[ic, y]	Acad.	Family	Fam.	Southeast[ern]	Se.
Administrat[ive, ion]	Admin.	Federal	Fed.	Southwest[ern]	Sw.
Amendment	Amend.	Federation	Fed'n	Supreme Court	Sup. Ct.
America[n]	Am.	Foundation	Found.	System[s]	Sys.
and	&	General	Gen.	Township	Twp.
Associate	Assoc.	Government	Gov't	Technical, ological, ology	Tech.
Association	Ass'n	Group	Grp.	Trust[ee]	Tr.
Attorney	Att'y	Hospital[ity]	Hosp.	United States	U.S.
Authority	Auth.	Independen[ce, t]	Indep.	University	Univ.
Board	Bd.	Institut[e, ion]	Inst.	<b>Publication Names</b>	
Cent[er]	Ctr.	International	Int'l	American Bar Ass'n	A.B.A.
Central	Cent.	Juvenile	Juv.	Annual	ANN.
Circuit	Cir.	Librar[y, ian]	Lib.	Behavior[al]	BEHAV.
Civil	Civ.	Local	Loc.	Bulletin	BULL.
Civil Rights	C.R.	Memorial	Mem'l	Business[es]	BUS.
College	Coll.	Metropolitan	Metro.	Catholic	CATH.
Commission	Comm'n	Municipal[ity]	Mun.	Chronicle	CHRON.
Commissioner	Comm'r	National	Nat'l	Commentary	COMMENT.
Committee	Comm.	North[ern]	N.	Constitution[al]	CONST.
Community	Cmty.	Northeast[ern]	Ne.	Employ[ee, er, ment]	EMP.
Company	Co.	Northwest[ern]	Nw.	Forum	F.
Consolidated	Consol.	Number	No.	Journal	J.
Cooperat[ion, ive]	Coop.	Offic[e, ial]	Off.	Law (except first word)	L.
Corporat[e, ion]	Corp.	Order	Ord.	Medi[cal, ine]	MED.
Counsel[or, ors, or's]	Couns.	Organiz[ation, ing]	Org.	Problems	PROBS.
County	Cnty.	Parish	Par.	Publication	PUBL'N
Court	Ct.	Policy	Pol'y	Quarterly	Q.
Department	Dep't	Public	Pub.	Research	RSCH.
Director	Dir.	Regional	Reg'l	Review	REV.
District	Dist.	Rehabilitat[ion, ive]	Rehab.	Society	SOC'Y
Division	Div.	Report[er]	Rep.	Teacher	TCHR.
East[ern]	E.	Retirement	Ret.	Tribune	TRIB.
Education[al]	Educ.	School	Sch.	[University names]	[see BB]
Equality	Equal.	Secretary	Sec'y	Week	WK.
Faculty	Fac.	South[ern]	S.	Yearbook	Y.B.

## Abbreviated Court Names

Abbreviate court names according to rule 10.4. This is a partial listing.

Administrative Court	Admin. Ct.	Eastern District	E.D.
Appeals Court	App. Ct.	Family Court	Fam. Ct.
Appellate Court	App. Ct.	High Court	High Ct.
Appellate Department	App. Dep't	Judicial	Jud.
Appellate Division	App. Div.	Juvenile	Juv.
Bankruptcy (Court, Judge)	Bankr.	Middle District	M.D.
Board of Tax Appeals	B.T.A.	Municipal Court	(Name) Mun. Ct.
Borough Court	(Name) Bor. Ct.	Northern District	N.D.
Central District	C.D.	Probate Court	Prob. Ct.
Children's Court	Child. Ct.	Recorder's Court	Rec's Ct.
Circuit Court (old federal)	C.C.	Southern District	S.D.
Circuit Court (state)	Cir.	Superior Court	Super. Ct.
Circuit Court of Appeals (fed)	Cir.	Supreme Court (U.S.)	U.S.
Circuit Court of Appeals (state)	Cir. Ct. App.	Supreme Court (other)	Sup. Ct.
City Court	(Name) City Ct.	Supreme Court, Appellate Div.	App. Div.
Civil Appeals	Civ. App.	Supreme Judicial Court	Sup. Jud. Ct.
Commonwealth Court	Commw. Ct.	Tax Appeal Court	Tax App. Ct.
Court of Appeals (federal)	Cir.	Tax Court	T.C.
Court of Appeals (state)	Ct. App.	Territor[ial, y]	Terr.
Court of Civil Appeals	Civ. App.	Tribal Court	(Name) Tribal Ct.
District Court (federal)	D.	Western District	W.D.
District Court (state)	Dist. Ct.	Workmen's Compensation Division	Workmen's Comp. Div.
District Court of Appeal(s)	Dist. Ct. App.		

## Abbreviations for Intermediate State Appellate Courts

Most states have a three-tiered judicial system that mirrors the federal courts with a trial court, an intermediate appellate court, and a court of last resort. Some states, however, only have two levels and do not have an intermediate appellate court. It is important to take great care with the names of state courts. It is also important to correctly abbreviate the names of the courts in the parenthetical information identifying the court and year of the decision at the end of the case citation. The highest court in all states is abbreviated with just the state's abbreviation. The chart below lists the abbreviations for intermediate appellate courts in those states that have them. Generally, if the court's name is Court of Appeals, it is abbreviated as Ct. App. But, when it is Appeals (or Appellate) Court it is App. Ct. However, there are exceptions and some states give their intermediate appellate court different names. If you aren't positive, please check the chart. With state courts you don't have to identify the district or division.

Alabama	Ala. Civ. App.	Idaho	Idaho Ct. App.	Minnesota	Minn. Ct. App.
Alaska	Alaska Ct. App.	Illinois	Ill. App. Ct.	Mississippi	Miss. Ct. App.
Arizona	Ariz. Ct. App.	Indiana	Ind. Ct. App.	Missouri	Mo. Ct. App.
Arkansas	Ark. Ct. App.	Iowa	Iowa Ct. App.	Nebraska	Neb. Ct. App..
California	Cal. Ct. App.	Kansas	Kan. Ct. App.	New Jersey	N.J. Super. Ct. App. Div
Colorado	Colo. App.	Ky. Ct. App.	Ky. Ct. App.	New Mexico	N.M. Ct. App.
Connecticut	Conn. App. Ct.	Louisiana	La. Ct. App.	New York	N.Y. App. Div.
Florida	Fla. Dist. Ct. App.	Maryland	Md. Ct. Spec. App.	North Carolina	N.C. Ct. App.
Georgia	Ga. Ct. App.	Massachusetts	Mass. App. Ct.	North Dakota	N.D. Ct. App.
Hawaii	Haw. Ct. App.	Michigan	Mich. Ct. App.	Ohio	Ohio Ct. App.
Oklahoma	Okla. Civ. App.	South Carolina	S.C. Ct. App.	Virginia	Va. Ct. App.
Oregon	Or. Ct. App.	Tennessee	Tenn. Ct. App.	Washington	Wash. Ct. App.
Pennsylvania	Pa. Super. Ct.	Texas	Tex. App.	Wisconsin	Wis. Ct. App.
Puerto Rico	P.R. Cir.	Utah	Utah Ct. App.		

**N.Y.A.D. (used in West) should be listed as N.Y. App. Div.**

## Abbreviated Geographic Entities

Most states, territories, and some cities should be abbreviated in case names.

### *States*

Alabama	Ala.	North Dakota	N.D.
Alaska	Alaska	Ohio	Ohio
Arizona	Ariz.	Oklahoma	Okla.
Arkansas	Ark.	Oregon	Or.
California	Cal.	Pennsylvania	Pa.
Colorado	Colo.	Rhode Island	R.I.
Connecticut	Conn.	South Carolina	S.C.
Delaware	Del.	South Dakota	S.D.
Florida	Fla.	Tennessee	Tenn.
Georgia	Ga.	Texas	Tex.
Hawaii	Haw.	Utah	Utah
Idaho	Idaho	Vermont	Vt.
Illinois	Ill.	Virginia	Va.
Indiana	Ind.	Washington	Wash.
Iowa	Iowa	West Virginia	W. Va.
Kansas	Kan.	Wisconsin	Wis.
Kentucky	Ky.	Wyoming	Wyo.
Louisiana	La.		
Maine	Me.	<i>Cities</i>	
Maryland	Md.	Baltimore	Balt.
Massachusetts	Mass.	Boston	Bos.
Michigan	Mich.	Chicago	Chi.
Minnesota	Minn.	Dallas	Dall.
Mississippi	Miss.	District of Columbia	D.C.
Missouri	Mo.	Houston	Hous.
Montana	Mont.	Los Angeles	L.A.
Nebraska	Neb.	Miami	Mia.
Nevada	Nev.	New York	N.Y.C.
New Hampshire	N.H.	Philadelphia	Phila.
New Jersey	N.J.	Phoenix	Phx.
New Mexico	N.M.	San Francisco	S.F.
New York	N.Y.		
North Carolina	N.C.		

# TEXT

## Basic points of ELA/Bluebook text style

**Narrative, not legal brief style.** Text should be in narrative style rather than legal brief style, with the purpose of clear, reader-friendly communication. This style avoids unnecessary capitalization and parentheticals (“Plaintiff”), and uses articles (“the plaintiff said, according to the defendants” instead of “Plaintiff said, according to Defendants”). Keep Latin terms to a minimum; check the ELA list of terms first, but otherwise do not italicize Latin unless obscure (per *Black’s Law Dictionary*), then explain what the term means if it’s really necessary to use it. Remember, ELA readers include students, teachers, professors, attorneys, consultants, administrators—not all of them have law degrees or can relate to legal document style.

**Active voice.** For more dynamic and efficient style, use active voice—“The court determined that...” rather than passive “The determination of the court was that...” “The plaintiff alleged” rather than “It was alleged by the plaintiff”

**Past tense.** Cases should always be written in past tense. Direct quotes using words in present tense do not change, but should be placed carefully within the past-tense narrative.

**Case names in italics and spelled out.** Case names used in sentences are in italics and spelled out, not abbreviated. However, if the superscript citation number appears after the case name, it is in regular type. *In re*, *ex rel*. remain in italics regardless of their placement.

**Sentences** should be of reasonable length and complexity; they should not start with the same word/phrase/clause several times in a row. The subject and verb, or subject and pronoun, should agree. Remember that “court” is a collective noun and uses “its” for the possessive pronoun, not “their” (same applies to board, district, etc.). And, it is acceptable to start a sentence with a conjunction, followed by a comma, but do this sparingly.

**Block quote:** Set off quotes of 50 or more words with indentations to the left and right, spaces above and below the block quote. No quotation marks around this copy. Shorter quotations are not set off from the text and do start and end with quotation marks.

**Internal citations:** ELA does not use them. Put citations in footnotes or endnotes.

**Closing quotation marks:** Placed outside of comma or period, generally inside of other punctuation such as colons, semicolons, or question marks, unless that end-of-sentence punctuation is part of the quotation. See Punctuation section.

**Spaces:** Only one space between sentences, not two, and no space between a footnote number and punctuation before it (...end of quote.”<sup>45</sup>).

**Proofread your work.** Consider writing for ELA to be like homework that will be “graded” by the editors. Follow the rules for the type of writing you are doing for ELA and proofread your work before you turn it in. Make sure the subject and verbs agree, as well as the nouns and pronouns. If you have links, please test them. The work will have YOUR name on it, will be circulated in print, and will be archived indefinitely.

**Editing.** All manuscripts are edited for grammar, typos, style, and obvious inaccuracies; however, editors do not check original sources. Copy may be altered slightly, or significantly. Writers will only be contacted if clarification is needed. ELA generally does not submit edited copy for writers’ review before publication.

**Ownership of materials.** Because ELA is a nonprofit organization with no full-time staff, agreements between writers and ELA generally are on an informal basis, rather than a formal contract, for materials used in periodicals. It is understood that ELA owns the materials and will use them responsibly, once manuscripts have been submitted.

## Miscellaneous ELA text style rules

**Gender Pronouns:** To avoid sexist language and the *he/his* or *she/her* dilemma, change to plurals or avoid pronouns whenever possible. Try to not use the singular *they/their* for an individual to demonstrate gender-neutral language, unless it is essential to what you are writing or part of a quote.

**Dates:** December 2020—no comma after the month if the day is not there. December 1, 2020—use a comma to separate day and year and a comma after the year if the sentence continues. “On December 1, 2020, the court...”

**Years:** 1996–97 (not 1996-1997), *but* 1999–2000; the 1990s (no apostrophe). Technically, the dash used in a range like years should be an en dash rather than a hyphen.

**Time:** a.m. or p.m.

**Latin words:** Follow *Black’s Law Dictionary*. Except for *in loco parentis*, do not italicize legal phrases commonly used in ELA text (pro se, certiorari, ad valorem, writ of mandamus, qui tam, prima facie), only those that are obscure. Phrases such as *rev’d in part*, *vacated in part*, and *on remand* are italicized in citations.

**Chapter:** The word *chapter* (as meaning part of a book) is lowercased when used in text. Example: *I found the answer in chapter 9* (note the use of the numeral 9 rather than spelling out nine). The word *chapter* as used in regard to bankruptcy is capped. Example: Chapter 7, Chapter 13 (note again the use of numerals).

**States:** States are generally abbreviated in citations unless they are the party’s only name. Alaska, Idaho, Iowa, Ohio, and Utah are not abbreviated. *The first trial was in Savannah, Georgia* (spell out states in text). Do not use two-letter postal abbreviations anywhere. See the abbreviation tables in this style guide or in the Bluebook.

## Case names, indexes

**Case names** in the *text* should be in *italics*, spelled out, and written according to rule 10.2.1 (c) in the Bluebook. Abbreviate only widely known acronyms (such as NAACP) and the words: &, Ass’n, Bros., Co., Corp, Inc., Ltd., and No.

**Case indexes:** For ease of indexing, ELA abbreviates all words in a case name according to the Bluebook. Alphabetize by case name; cases starting with *In re* do not go under “I” but under the letter of the first case name. Double check that cases in footnotes/endnotes are consistent with case names in the index.

## Capitalization

**Capitalization.** Because of our preferred narrative style, as compared with legal brief or academic style, capitalization should be kept to an appropriate minimum. Avoid capping Plaintiff, Defendant, or special education terms followed by the acronym. Generally, capitalize only formal names: Eleventh Circuit Court (but the court), Superintendent Smith (but the superintendent), Governor Jones (but the governor). Other words always capitalized are the Constitution (but not constitutional) and references to its parts (First Amendment, Establishment Clause, Equal Protection Clause); the Court when it refers to the U.S. Supreme Court (as well as its Justices); and certain sections of statutes (ELA caps Section 1983, Section 504). See the list of terms in this style guide for help with capitalization.

**Capitalize:** Article 78, Act 112, Rule 11, Regents, Indian Tribe(s), Title IX, Title V, Section 1983, Section 504

**Capitalize** national departments but not state departments unless given a full title. (e.g., Department of Education (nat’l), state department of education, Nevada Department of Education.) Follow the same rule for other government offices. For titles, capitalize only when accompanied by the person’s name, whether national or state (e.g., the secretary of education, Secretary of Education Frank Johnson, the commissioner, Commissioner Smith.)

**Capitalize appropriate words of hyphenated headings:** Reduction-in-Force Plan, Call-Back Rights, Faith-Based Schools

**Capitalizing in headlines and subtitles:** Caps on first word, last word, all other major words (including nouns, pronouns, verbs, adjectives, adverbs, and some conjunctions). Lowercase articles (*the, a, an*), conjunctions (*and, but, or, nor*), *as* in any usage, and most prepositions (*of, to, in, for, on, by, with, but, during, under, from, at, into, about, after*, etc.).

## Numbers

**ELA numbers diverge from the Bluebook.** With numbers, ELA differs from the Bluebook by generally spelling out one through nine and using numerals for 10 and above (instead of the Bluebook rule of spelling out numbers through 99), though there are exceptions. In addition to one through nine, spell out numbers where appropriate, including constitutional amendments (Fourteenth Amendment, not 14th Amendment) in text. When using more than one percentage or age in a sentence, use numerals for all (even those less than 10). Other journals and publications are adopting this more modern style, as well.

**Percentages:** If there is only one reference to a percentage and it is one through nine, spell out the number and use the word percent rather than the % symbol (*the eight-year loan has an interest rate of three percent*). Otherwise use numerals (35%), except when the first word in the sentence (*Thirty-five percent of the building was found to be structurally unsound*). If more than one percentage is used in the sentence, or if the percentage has a decimal point, use numerals and the % symbol for all of them.

## Hyphens

**Hyphenated prefixes:** Most standard words with a prefix are NOT hyphenated (nonprofit, nonrenewal, preschool, pretrial, postseason, antidiscrimination, etc.), even if the prefix ends in a vowel and the word that follows begins with the same vowel of “e” or “o” (i.e., reelect, reestablish, cooperator of the firm), unless it would be confusing without hyphenation (e.g., co-edition, anti-utopian).

**Hyphenated modifiers:** Compound adjectives are often hyphenated before a noun but not after (e.g., a time-barred action *but* the action is time barred, a hearing-impaired student *but* the student is hearing impaired); the exception is compound adjectives that are clearly understood without the hyphen (high school student, circuit court decision). Also, compound adjectives that end in *-ly* are NOT hyphenated (e.g., a religiously oriented presentation; highly recommended book) (See Table 6.1 from *The Chicago Manual of Style* for an in-depth treatment of compound words/words with prefixes and suffixes.)

**Hyphenated case names:** pre-Florence County, post-Florence County

## Punctuation

**Note:** We use U.S. rather than British-influenced spelling and punctuation conventions

**Comma.** Use commas at natural pauses, to set off phrases or clauses, after an opening adverb or prepositional phrase (*Finally, - In the past, - On January 28,*), and the series (Oxford) comma. If a lengthy sentence has too many clauses with commas and becomes hard to follow, use a semicolon or make it two sentences.

**Series comma (Oxford comma):** Use a comma before the word “and” in a series. *The plaintiff claimed age, sex, and race discrimination.*

**Quotation marks:** “Closing quotation marks go outside of commas and periods,”<sup>5</sup> and citation superscripts go outside of the quotation marks in these cases. Closing quotation marks go inside of colons and generally are placed inside of question marks and exclamation points, unless that punctuation goes with the quoted matter (“*Who do you think you are?*” *the judge asked.*). Do not use quotation marks with a block quote of more than 50 words set off from the main copy.

**Semicolon:** Use to separate items in a text list that are long and contain a comma anywhere in the item. Use to merge two related sentences into one (or to break up a too-long sentence) before the words *however, thus, therefore,* or the like.

**Colon:** Avoid colons in text for the most part, except preceding a block quote, but capitalize a free-standing sentence after a colon.

**Em dash:** The long dash—used in a sentence to set off a separate thought—does not have a space before or after it. Use the Symbol menu in Word for this. Use in the Yearbook only when it is essential to understanding a long and complex sentence.

**Exclamation point:** Generally not used in ELA copy except as part of a quotation

## Terminology - Style, Spelling, Punctuation in Text

1960s (decades), in her 30s (ages) = no apostrophe

20th century (but lower case twentieth-century as adjective before noun or capitalized in titles)

Abbreviate in text case names: widely known acronyms plus &, Ass'n, Bros., Co., Corp, Inc., Ltd., and No.

administrative law judge (ALJ)

African American (in all placements, not African-American, per *Chicago Manual of Style*)

after-school (hyphen before a noun, *after-school program*, but open after the noun)

afterward (not afterwards)

Americans with Disabilities Act (ADA) (subsequently use "the Act" for a specific act, but lower case for a generic reference to an act)

and/or (not and-or), no space before or after slash

"anti" prefix: generally no hyphen (antiabortion, antidiscrimination, antivaccine, antiwar, but anti-American, anti-school prayer)

Asperger syndrome (no possessive for the Asperger name, no cap on syndrome)

assure = to express an intention or promise

at-risk student (but the student is at risk)

attention deficit disorder (ADD), attention deficit hyperactivity disorder (ADHD)

attorney fees (not possessive)

at-will employee

"autistic" = do not use, say "student with autism" or "child with autism"

a while or awhile = *Awhile* is an adverb that means "for a while," whereas *while* is a noun meaning "a period of time." Generally, the two-word form

"a while" should be used when following a preposition ("I will read for a while"), or with the words *ago* or *back* ("a while ago/back"). *Awhile*

should be used to modify a verb ("I will wait awhile") and can usually replace any usage of "for a while."

B.A., B.S., or other variation (bachelor's degree)

behavioral intervention plan (BIP)

benefited

"bi" prefix: means two and is not hyphenated (biennial is every other year, semiannual is twice a year)

Black = with cap (racial designation)

board = no cap when by itself: the board voted to terminate the teacher, unless the party identified as (Board) board (cap only with full formal name,

no cap when standing alone as in "the school board" or "the board of directors")

breach of contract claim (no hyphens necessary)

busing (as in school busing, not bussing)

canceled

certiorari

child-find

Circuit Court for the District of Columbia

cleanup (noun) clean up (verb)

"co" prefix: co-editors, co-authors, co-workers

Common Core (caps)

Congress (for U.S. Congress), but congressional

Constitution (for U.S. Constitution), but constitutional

Court (stand-alone court is capped for any reference to U.S. Supreme Court), but lower case for other courts

COVID or COVID-19

cyberbullying, cyberspace (no hyphen)

daycare

decisionmakers (decision-making before noun)

"disabled" = do not use, say "student with disabilities" or "child with disabilities"

Down syndrome (no possessive for Down, no cap on syndrome)

Ed.D. (not EDD)

ensure = to guarantee

email, ebook (no hyphen)

*ex rel.* = italics, replace "on behalf of" "next friend to" and similar phrases in case names

Establishment Clause (any clause referring to the U.S. Constitution would be capped)

fall (the season, as in fall semester, fall of 2022) is not a capitalized proper noun

firefighter

for-profit (but nonprofit)

free appropriate public education (FAPE) (not “free and appropriate” and no caps when spelled out)

functional behavioral assessment (FBA)

fundraiser, fundraising

grades: A or As (not “A” or “A’s”)

gray, not grey

Hawaii (not Hawai’i)

healthcare

he or she, his or her = avoid this and singular “they/their” by writing sentence with gender-neutral or plural nouns

homepage

homeschool (homeschooling/homeschooler)

*Id.* = (in citations) in italics, with period

*in loco parentis*

*In re* = in case name is in italics, alphabetize by the case name and not under “I”

individualized education program (IEP)—not “educational” or spelled out with caps

Internet = Capitalize when referring to the Internet, not using it to modify another noun, e.g. internet users, internet sources

insure = referring to insurance

its or it’s = common autocorrect error adds the contraction’s apostrophe. Its is the pronoun for collective nouns (court, board, team), not their.

January of 2007, January 2007, or January 24, 2007 (not January, 2007)

J.D.

judgment

K-12 or P-12 = elementary and secondary, not K12 or PK12

kindergarten, kindergartners

lastly = do not use, replace with finally, and avoid other ordering words ending in “-ly” (secondly, thirdly, etc.)

Latin words = do not italicize common Latin words (pro se, certiorari, ad valorem, writ of mandamus, qui tam, prima facie)

layoffs, laid off

least restrictive environment (LRE)

LGBTQ+ = ELA style choice

“legitimate, nondiscriminatory”— use comma and do not hyphenate

lineup (noun), line up (verb)

L.L.M. degree

local education agency (LEA)

M.A., M.S., M.B.A. or other variation (master’s degree)

multifaceted, multipurpose, multiracial

“non” prefix generally is not hyphenated: nondiscriminatory, nonprofit, nonpublic, nonrenewal (but hyphenate non-negotiable)

obsessive-compulsive disorder (OCD)

oppositional defiant disorder (ODD)

off-season, off-duty

other health impairment

out-of-court settlement

overbroad

pat-down searches

Ph.D.

pickup (adjective, noun) pick up (verb)

policymaker (policy-making before noun)

\*Possessive for individual's name ending in "s" = add 's (Lucas's claim); not for plurals (the Joneses' claim, the plaintiffs' claim)

post-traumatic stress disorder (PTSD)

"pre" prefix: preconference, preschool, pretermination hearing (generally no hyphen)

premier (first in status or importance), premiere (first showing of a play, movie, etc.)

"re" prefix: reevaluate, realign, reappointment, reemployment (hyphen is unnecessary if the meaning is clear)

Racial terms: African American (no hyphen), Black, White, Latina/Latino/Latinx, Hispanic, Asian American, Native American, other race terms should be used with caution and judgment. These will be updated as new information is received.

schoolchildren

Section 1983 (42 U.S.C. § 1983) – ELA style choice

Section 504 (Section 504 of the Rehabilitation Act) – ELA style choice

sign-language interpreter

signaling

(Social media terms) Facebook, Twitter, MySpace, Snapchat, LinkedIn, tweet, blog, text

spring (as in spring semester, spring of 2022) is not a capitalized proper noun

state education agency (SEA)

statute of limitations (beware of "statue" typo)

stay-put

strip-search (noun), strip search (verb)

student-athlete

summer (as in summer term, summer of 2022) is not a capitalized proper noun

T-shirt

the ADA, the IDEA

they/their as singular pronoun = to avoid gender pronoun disputes, use only if essential, as from a court document; substitute generic or plural forms

totaling

toward (not towards)

traumatic brain injury

traveled, traveling

unilateral withdrawal

university = no cap when by itself unless formally identified as the party (University)

v. = versus in case name, always with period

vendor

webpage, website

willful

winter (as in winter term, winter of 2022) is not a capitalized proper noun

workplace

workers' compensation (not worker's or workman's)

X-ray

### **Hyphenate before noun (open after noun)**

full (full-time employee, employee works full time)

part (part-time employee, employee works part time)

high (high-functioning student, student is high functioning)

### **Hyphenate**

time (time-barred, time-sensitive)

well-

less-

\_\_\_\_ -impaired

\_\_\_\_ -related

## Differences between West citation style and ELA/Bluebook

**In writing for ELA publications and using West materials as a resource (such as Westlaw for cases), it's important to know the citation style differences between the two. Materials submitted to ELA should be in ELA/Bluebook style. A recent rule change for manuscripts submitted for publication in *Education Law Reporter* is that they now follow ELA/Bluebook style as well; previously, they were in West style.**

Although West uses Ed.Law Rep. as the abbreviation for ELR, the BB abbreviation of Educ. L. Rep. will be used when published in ELA periodicals or publications. Use regular type citing cases and SMALL CAPS citing articles. Placement of the ELR citation in the case name should follow the official citation as a parallel citation.

Case citation: C.W. *ex rel.* B.W. v. Denver Cnty. Sch. Dist. No. 1, 994 F.3d 1215, 389 Educ. L. Rep. 32 (10th Cir. 2021).

Article citation: For a commentary on this issue, see Perry A. Zirkel, *Specially Designed Instruction under the IDEA: Is it Something Special?* 387 EDUC. L. REP. 17 (2021).

The West advance sheets are inconsistent in spelling out or abbreviating words in citations, as well as spacing (for space considerations, West omits most spaces in abbreviations). The Bluebook abbreviates most words in citations in accordance with its Tables section.

West abbreviates Federal Appendix as Fed. Appx., whereas the BB uses F. App'x (with no period after the x).

West uses state names when referencing the federal Circuit Courts of Appeal (which West abbreviates C.A.) and places the reference first in the order of the citation, as it does for all courts. For the Circuit Courts in Bluebook style, delete the state names, list only the circuit number, e.g. (5th Cir. 2021) not (C.A. 5 Tex. 2021), and place it at the end of the full citation (after the Educ. L. Rep. parallel citation) in parentheses with a period. See the above example for proper format.