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To Abbreviate or Not to Abbreviate: A Perspective on Administrative Agency Bluebook Citations

Taryn L. Rucinski, Pace Law Library

For students and practitioners, one of the most confusing issues posed today by *THE BLUEBOOK: A UNIFORM SYSTEM OF CITATION* (Columbia Law Review Ass'n et al. eds., 19th ed. 2010), lies in when and how to abbreviate federal and state administrative agency names. Or to put it another way: Do I use: EPA, E.P.A., Env'tl. Protection Agency, or U.S. Env'tl. Protection Agency? As an adjunct professor specializing in environmental law, I often encounter issues relating to administrative agency and organization abbreviations; such issues pop up more often than you would expect and impact citation forms ranging from administrative agency case names to guidance documents to agency websites and more. Because this issue frustrates on a regular basis, I thought it might be beneficial to provide a fresh perspective on these types of abbreviations.

In the future, the drafters of the 20th edition of *The Bluebook* may overhaul the administrative agency section, but in the meantime, instructors will have to direct students to Rule 6.1(b), Abbreviations, Numerals, and Symbols: Periods (not an intuitive section) for guidance on abbreviations for agencies and organizations as *The Bluebook* is largely silent on this issue. Rule 6.1(b) states, [s]ome entities with widely recognized initials, e.g., AARP, CBS, CIA, FCC, FDA, FEC, NAACP, NLRB, are commonly referred to in spoken language by their initials rather than by their full names; such abbreviations may be used without periods in text, in case names, and as institutional authors. Do not, however, omit the periods when the abbreviations are used as reporter names, in names of codes or as names of court decisions.” (emphasis added).

Part of the reason this issue is so confusing is that

The Bluebook treats agency and/or organization abbreviations as optional while at the same time treating the same entities differently based on the context in which they are mentioned. This issue is further complicated by a few printing errors and several inconsistencies, particularly in Table 1.2.

Best guidance:

1. Abbreviating using initials is optional. For this reason, when in doubt, it is not improper for students and practitioners to abbreviate using Tables 6 and 10 located at the back of *The Bluebook*.
 - ⇒ Rule 10.2.2: U.S. Dep't of Justice
But see Table 1.2: Dep't of Labor
 - ⇒ Table 1.2: FCC
 2. Periods are used between abbreviated letters (i.e., F.T.C.) only when an agency decision, code, or reporter is being cited (not to be confused with dockets or other memoranda).
 - ⇒ Rule 14.1: Reichhold Chems., Inc., 91 F.T.C. 246 (1978).
 3. Abbreviations consisting solely of initials can only be used in “text . . . in case names, and as institutional authors.” However, in reality, this rule allows such an abbreviation to be used almost everywhere:
 - ⇒ Table 1.2 & 6.1(b): The NRC is charged with the administration of . . .
 - ⇒ Rule B4.1.2: Env'tl. Def. Fund v. EPA, 465 F.2d 528 (D.C. Cir. 1972).
- Other example:
- ⇒ EEOC, No. 915.002, ENFORCEMENT GUIDANCE: APPLICATION OF EEO LAWS TO CONTINGENT WORKERS PLACED BY TEMPORARY EMPLOYMENT AGENCIES AND OTHER STAFFING FIRMS (1997).

In particular, the Rules related to institutional authors are expansive and cover books, reports,

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Abbreviations (cont'd)

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and other nonperiodic materials - Rule 15.1(c); electronic media - Rule 18.2.2(a); other administrative and executive publications - Rule 14.2(d); and international materials - Rules 21.7.3(a),(c), and 21.7.4. Furthermore, according to a Nov. 21, 2010 Blue Tip posted to LegalBluebook.com this rule can also be expanded to include electronic media main page titles “[w]here a main page title is better characterized as an institutional author” even though main page titles are usually only abbreviated according to Table 13 Periodicals.

Other example:

⇒ *Enforcement Matters*, FEC, <http://www.fec.gov/em/em.shtml> (last visited Oct. 23, 2013).

Rule 6.1(b) sets forth a subjective standard that varies based on the group, audience or speaker as this rule applies to those entities, “commonly referred to in spoken language by their initials.” The subjective nature of this rule is supported by the introduction to Table 1.2, a “non-exclusive table of administrative agency and executive materials”. The only caveat here is that the agency needs to be referred to regularly by only its initials by the intended publication audience.

⇒ Rule 14.2(d): U.S. GOV'T ACCOUNTABILITY OFFICE, GAO-08-751, FOOD AND DRUG ADMINISTRATION: APPROVAL AND OVERSIGHT OF THE DRUG MIFEPREX 27 (2008).

Other example:

⇒ Law Library publication: Table 1.2: GAO

4. Rule 14 instructs us to cite “state materials by analogy to the federal examples” provided in Rule 14 and Table 1.2. As a result, this abbreviation scheme can also be readily applied to the state agencies:

⇒ Table 1.2: N.C. Dep't of Env'tl. Health and Natural Res.

Other examples:

⇒ N.Y. DEC

⇒ Cal. EPA

[Editor's Note: The remainder of this article is a chart of abbreviations of various agencies and organizations, along with the applicable *Bluebook* rule for each. Because it does not fit within the dual-column format of the *Newsletter*, the chart is found on [page 19](#).

Member News (cont'd)

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of Law Library, tells us: “I’m happy to share that I have been selected to attend the 2014 AALL Leadership Academy (and my generous employer is sending me!).”

In September 2013, **Brian Anderson** of Taggart Law Library, Ohio Northern University Pettit College of Law, presented two articles at the Law Via the Internet Conference in Jersey. One of those articles, co-authored with Professor Howard Fenton, was published last month in the inaugural issue of the *JOURNAL OF OPEN ACCESS TO LAW*. The article, *Internet Enhancement of the Role of Civil Society in Promoting the Rule of Law in Transitional States*, examines the potential for online access to laws and legal information to give citizens meaningful access to, and interactions with, government. Brian says: “I am especially proud of this publication, both for the contribution to the dialogue of access to legal information and the rule of law, but also to support open-access publishing.”

Loyola Los Angeles Law Library has added two new reference librarians to its staff: **Sherry Leysen**, formerly a reference librarian at the University of Washington, and **Caitlin Hunter**, a recent graduate of the University of Denver School of Library and Information Science.

THE VIRGINIA LAWYER publishes one issue a year devoted to legal research with all the articles written by librarians. This year, in the December

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Abbreviations (cont'd)

Agencies* and Organizations:

American Association of Retired Persons	R6.	AARP
Armed Services Board of Contract Appeals	T1.	ASBCA
Civilian Board of Contract Appeals	T1.	CBCA
Columbia Broadcast System	R6.	CBS
Central intelligence Agency		CIA
Department of Agriculture	T1.	USDA
Department of Commerce, National Oceanic Atmospheric Administration	T1.	NOAA
Department of Commerce Patent and Trademark Office	T1.	USPTO
Department of Energy Nuclear Regulatory Commission	T1.	NRC
Environmental Protection Agency	T1.	EPA
Equal Employment Opportunity Commission	T1.	EEOC
Federal Aviation Administration	T1.	FAA
Federal Communications Commission	R.6.	FCC
Federal Election Commission	R6.	FEC
Federal Energy Regulatory Commission	T1.	FERC
Federal Labor Relations Authority	T1.	FLRA
Federal Trade Commission	T1.	FTC
Food & Drug Administration	R6.	FDA
Government Accountability Office	T1.	GAO
Internal Revenue Service**	T1.	IRS
International Trade Commission	T1.	USITC
Merit Systems Protection Board	T1.	MSPB
National Association for the Advancement of	R6.	NAACP
National Labor Relations Board	R.6.	NLRB
National Mediation Board	T1.	NMB
National Transportation Safety Board	T1.	NTSB
Occupational Safety and Health Review Commission	T1.	OSHRC
Securities and Exchange Commission	T1.	SEC
Small Business Administration	T1.	SBA
Social Security Administration	T1.	SSA
Surface Transportation Board	T1.	STB

* Other abbreviations are listed with within individual agency entries e.g. Department of Agriculture and Department of the Interior.

** Listed with periods.