

ACUS Rules of Citation & Style

This guide seeks to standardize the staff’s citation and stylistic practices. It is primarily intended for use in staff members’ technical contributions to formal ACUS recommendations and statements. It may also prove useful for standardizing citation and stylistic practices in the creation of Office of the Chairman and in-house research reports. These rules are not intended to bind reports created by consultants, although consultants may find it useful.

This guide is not an exhaustive source of citation and style rules. Its rules are drawn in part from *The Bluebook* and in part from the style guide of *The Regulatory Review*. All citation and style points not covered in this guide are governed by the current edition of *The Bluebook: A Uniform System of Citation*.¹ For citation and style points not covered by *The Bluebook*, consult *The Chicago Manual of Style*² and the attorney advisor with responsibility for this document.³

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¹ The most recent edition of *The Bluebook* should be used, which is currently the 21st Edition.

² The most recent edition of *The Chicago Manual of Style* should be used, which is currently the 17th Edition.

³ The attorney advisor contact for the style guide is Leigh Anne Schriever.

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Part I. Rules of Citation

A. Commonly Cited ACUS Sources

RULE 1. FINAL RECOMMENDATIONS. Citations to formal ACUS recommendations include (1) the Conference's abbreviated name and the recommendation's number, (2) the title, (3) the *Federal Register* citation, and (4) the date of publication in the *Federal Register* in parentheses. Per the rule on numbers, *Federal Register* page numbers do not include commas because the *Federal Register* does not use commas in its own numbering system. The title of the recommendation is *italicized*. All other components appear in ordinary roman type.

- **Example:** Admin. Conf. of the U.S., Recommendation 2017-1, *Adjudication Materials on Agency Websites*, 82 Fed. Reg. 31039 (July 5, 2017).

If citing a recommendation in its entirety, there is no need to include a pinpoint citation. The page included should be the first page on which the recommendation occurs (*not* the first page of the *Federal Register* notice itself). If citing to the preamble of a recommendation, do not include a paragraph number but do include a pincite to the *Federal Register* page on which that portion of the preamble appears. If the preamble and the first page of the *Federal Register* notice are the same, include the page number twice. If citing to a specific numbered paragraph within the recommendation (not the preamble), add a pinpoint citation that includes (1) the number of the numbered paragraph being cited, preceded by the paragraph symbol (¶) and a non-breaking space, and (2) the *Federal Register* page on which that portion of the recommendation appears.

- **Example:** Admin. Conf. of the U.S., Recommendation 2017-1, *Adjudication Materials on Agency Websites*, ¶ 1, 82 Fed. Reg. 31039, 31040 (July 5, 2017).

After providing the full citation for a recommendation, use the short form for all subsequent citations. The short form for recommendations consists of (1) the recommendation number, (2) a *supra* reference to the footnote in which the recommendation originally appeared, and (3) the specific numbered paragraph being cited from the recommendation (if applicable).

- **Example:** Recommendation 2017-1, *supra* note 23, ¶ 1.

Citations to recommendations that have not yet been published in the *Federal Register* contain two underscores in place of a page number. Include the expected volume number, which can be determined by subtracting 1935 from the year of publication or looking at other publications from that year to determine the correct number. The date parenthetical contains the date it was approved by the Assembly.

- **Example:** Admin. Conf. of the U.S., Recommendation 2017-5, *Agency Guidance*, 83 Fed. Reg. __ (approved Dec. 14, 2017).

Note. Do not include the *Code of Federal Regulations* citations that are associated with certain ACUS 1.0 recommendations.

RULE 2. STATEMENTS. Citations to formal ACUS statements are identical to citations to recommendations (*see* RULE 1), save that “Statement” replaces “Recommendation” and the number sign (#) and statement number, without a space in between, are used in place of a recommendation number.

- **Example:** Admin. Conf. of the U.S., Statement #18, *Improving the Timeliness of OIRA Regulatory Review*, 78 Fed. Reg. 76275 (Dec. 17, 2013).

Cite proposed statements in the same manner as proposed recommendations. *See* RULE 3.

RULE 3. PROPOSED RECOMMENDATIONS. Citations to proposed recommendations consist of (1) the abbreviated name of the agency, (2) “Proposed Recommendation,” (3) the title, and (4) the date of the specific draft cited in parentheses. All components are in ordinary roman type, save for the title, which is in *italics*.

- **Example:** Admin. Conf. of the U.S., Proposed Recommendation, *Regulatory Waivers and Exemptions* (Sept. 21, 2017).

Pinpoint citations to the numbered paragraphs within a proposed recommendation (not the preamble) are created by inserting the paragraph number of the recommendation being cited after the title, with a non-breaking space between the paragraph symbol and the paragraph number.

- **Example:** Admin. Conf. of the U.S., Proposed Recommendation, *Regulatory Waivers and Exemptions*, ¶ 6 (July 21, 2017).

Short-form citations consist of the words “Proposed Recommendation,” the title of the proposed recommendation, a *supra* reference, and the numbered paragraph within the recommendation being cited (if applicable).

- **Example:** Proposed Recommendation, *Regulatory Waivers and Exemptions*, *supra* note 7, ¶ 6.

RULE 4. CONSULTANT AND IN-HOUSE REPORTS. Citations to consultant and in-house reports consist of five components: (1) the author’s name; (2) the title of the report; (3) a parenthetical containing the month, day, and year of the report’s publication; and (4) a second parenthetical containing the words “report to the Admin. Conf. of the U.S.”

Citations to consultant and in-house reports are in ordinary roman type. The word “draft” precedes “report” in the “report to the Admin. Conf. of the U.S.” parenthetical in the case of draft reports.

- **Example:** Nathan Cortez, Agency Publicity in the Internet Era (Sept. 25, 2017) (report to the Admin. Conf. of the U.S.).

Pinpoint citations are placed immediately after the report’s title but before the date, without a comma before the page number.

- **Example:** Nathan Cortez, *Agency Publicity in the Internet Era* 10 (Sept. 25, 2017) (report to the Admin. Conf. of the U.S.).

After providing the full citation for a report, use the short form for all subsequent citations. The short form for reports consists of (1) the author’s last name, (2) a *supra* and the footnote the report was first cited in, and (3) the page number of the report preceded by “at.”

- **Example:** Cortez, *supra* note 11, at 32.

Note. In some cases, the original report is not available on the ACUS website. These reports are still available in ACUS’s files and should be cited to in the same manner.

RULE 5. OFFICE OF THE CHAIRMAN REPORTS. Citations to Office of the Chairman reports are formed in the same manner as consultant and in-house reports (*see* RULE 4), save for the following:

1. “Admin. Conf. of the U.S., Office of the Chairman” follows the author’s name and precede the title of the report.
2. The “report to the Admin. Conf. of the U.S.” parenthetical is not used.

- **Example:** Stephanie J. Tatham & Matthew Lee Wiener, Admin. Conf. of the U.S., Office of the Chairman, *Evaluating Subjective Symptoms in Disability Claims* (March 12, 2015).

RULE 6. SOURCEBOOKS. ACUS sourcebooks are cited in the same manner as books written by individuals on behalf of an institution and include (1) the author’s name, (2) the abbreviated agency name, (3) the title of the sourcebook, (4) a pincite (if applicable), and (5) the year of publication in parentheses. All components are in SMALL CAPS.

- **Example:** DAVID E. LEWIS & JENNIFER L. SELIN, ADMIN. CONF. OF THE U.S., SOURCEBOOK OF UNITED STATES EXECUTIVE AGENCIES (2012).

Exception: The Federal Administrative Procedure Sourcebook is cited as in the example below. The URL should be a clickable hyperlink, but the URL text should be in ordinary roman type (i.e., the text should not be blue or underlined).

- **Example:** *Freedom of Information Act*, ADMIN. CONF. OF THE U.S., FEDERAL ADMINISTRATIVE PROCEDURE SOURCEBOOK, https://sourcebook.acus.gov/wiki/Freedom_of_Information_Act/view (last visited Feb. 17, 2021).

RULE 7. INFORMATION INTERCHANGE BULLETINS. Citations to Information Interchange Bulletins include (1) the abbreviated agency name, (2) the bulletin number, (3) the bulletin title, and (4) the date of publication in parentheses.

- **Example:** Admin. Conf. of the U.S., IIB-007, Agency Bid Protests (June 2020).

RULE 8. SYMPOSIA AND FORUMS. Citations to an ACUS symposium or forum includes (1) the abbreviated name of the agency, along with any other hosts of the event; (2) the kind of event held (e.g. symposium or forum); (3) the title of the event; and (4) the year of the event in parentheses. The title of the event is in *italics* and the rest of the citation is in ordinary roman type.

- **Example:** Admin Conf. of the U.S. & Admin. L. Rev., Symposium, *Mass and Fake Comments in Agency Rulemaking* (2018).

Pinpoint citations are created by inserting the page number from the transcript of the event after the title of the event.

- **Example:** Admin Conf. of the U.S. & Admin. L. Rev., Symposium, *Mass and Fake Comments in Agency Rulemaking* 26 (2018).

Construct short-form citations in the same manner as below.

- **Example:** *Mass and Fake Comments in Agency Rulemaking*, *supra* note 3, at 19.

B. Other Commonly Cited Sources

RULE 9. EXECUTIVE ORDERS. Citations to executive orders consist of (1) the number of the executive order (preceded by “Exec. Order. No.”), (2) the order’s *Federal Register* citation, and (3) the date the order was published in parentheses. Per the rule on numbers, *Federal Register* page numbers and executive order numbers do not include commas because the *Federal Register* and the White House do not use commas in their own numbering systems.

- **Example:** Exec. Order No. 13563, 76 Fed. Reg. 3821 (Jan. 18, 2011).

Pinpoint citations to executive orders are created by inserting the relevant section of the executive order following the order’s number. The section is preceded by the section symbol (§). A non-breaking space should be inserted after the section symbol.

- **Example:** Exec. Order No. 13563, § 1(a), 76 Fed. Reg. 3821, 3821 (Jan. 18, 2011).

Construct short-form citations in the same manner as the example below.

- **Example:** Exec. Order. No. 13563, *supra* note 12, § 1(a).

RULE 10. CONGRESSIONAL RESEARCH SERVICE REPORTS. Citations to Congressional Research Service reports consist of five components: (1) the author’s name, (2) the abbreviated name of the agency, (3) the report number, (4) the title of the report, and (5) the year of the report in parentheses. All components are in SMALL CAPS.

- **Example:** JARED P. COLE, CONG. RSCH. SERV., R44699, AN INTRODUCTION TO JUDICIAL REVIEW OF FEDERAL AGENCY ACTION (2016).

Pinpoint citations are placed immediately after the report's title but before the date, without a comma before the page number.

After providing the full citation for a CRS report, use the short form for all subsequent citations. The short form for reports consists of (1) the author's last name, (2) a *supra* and the footnote the report was first cited in, and (3) the page number of the report preceded by "at."

- **Example:** Cole, *supra* note 2, at 6.

RULE 11. GOVERNMENT ACCOUNTABILITY OFFICE REPORTS. Citations to Government Accountability Office reports consist of four components: (1) the abbreviated name of the agency, (2) the report number, (3) the title of the report, and (4) the year of publication in parentheses. All components are in SMALL CAPS.

- **Example:** U.S. GOV'T ACCOUNTABILITY OFF., GAO-11-318SP, OPPORTUNITIES TO REDUCE POTENTIAL DUPLICATION IN GOVERNMENT PROGRAMS, SAVE TAX DOLLARS, AND ENHANCE REVENUE (2011).

Pinpoint citations are formed by inserting the page number immediately following the title of the report.

After providing the full citation for the report, use the short form for all subsequent citations. The short form for consists of (1) the abbreviated name of the agency, (2) a *supra* and the footnote the report was first cited in, and (3) the page number of the report cited.

RULE 12. OFFICE OF MANAGEMENT & BUDGET DOCUMENTS. Citations to Office of Management and Budget circulars contain (1) the abbreviated name of the office and the Executive Office of the President, (2) the number of the circular, (3) the title of the circular, and (4) the year of publication in parentheses, all in SMALL CAPS.

- **Example:** OFFICE OF MGMT. & BUDGET, EXEC. OFFICE OF THE PRESIDENT, OMB CIRCULAR A-130, MANAGEMENT OF FEDERAL INFORMATION RESOURCES (1996).

Pinpoint citations are formed by inserting the section number of the section being cited immediately following the title of the circular.

- **Example:** OFFICE OF MGMT. & BUDGET, EXEC. OFFICE OF THE PRESIDENT, OMB CIRCULAR A-130, MANAGEMENT OF FEDERAL INFORMATION RESOURCES § 5 (1996).

After providing the full citation, use the short form for all subsequent citations. Construct short-form citations in the same manner as the example below.

- **Example:** OMB CIRCULAR A-130, *supra* note 9, § 5.

Cite Office of Management and Budget memoranda in the same manner as circulars but include the memorandum number in place of the circular number.

- **Example:** OFFICE OF MGMT. & BUDGET, EXEC. OFFICE OF THE PRESIDENT, OMB MEMORANDUM M-21-06, GUIDANCE FOR REGULATION OF ARTIFICIAL INTELLIGENCE APPLICATIONS (2020).

RULE 13. AGENCY WEBSITES. Citations to agency websites include (1) the name of the page, (2) the agency as the institutional author, (3) the link to the website, and (4) the date last visited in parentheses. The URL should be a clickable hyperlink, but the URL text should be in ordinary roman type (i.e., the text should not be blue or underlined). The name of the page is in *italics* and the institutional author is in SMALL CAPS.

- **Example:** *BLS Announcement Page*, U.S. DEP'T OF LAB., <https://www.bls.gov/bls/announcement.htm> (last visited Jan. 13, 2021).

RULE 14. CODE OF FEDERAL REGULATIONS. Citations to provisions in the *Code of Federal Regulations* include the C.F.R. citation. Insert a non-breaking space after the section symbol.

- **Example:** 5 C.F.R. § 1300.1.

RULE 15. FEDERAL REGISTER. Citations to provisions in the *Federal Register* include (1) the title of the provision, (2) the *Federal Register* citation, (3) the date it was published in parentheses, and (4) any additional information about the document's status in a second parenthetical. When citing notices of proposed rules and regulations, add the status to the date parenthetical. All components are in ordinary roman type. Per the rule on numbers, *Federal Register* page numbers do not include commas because the *Federal Register* does not use commas in its own numbering system.

- **Example:** Meeting Notice, 65 Fed. Reg. 3415 (Jan. 21, 2000).
- **Example:** Control of Air Pollution from New Motor Vehicles and New Motor Vehicle Engines, 56 Fed. Reg. 9754 (proposed Mar. 7, 1991) (to be codified at 40 C.F.R. pt. 86).

RULE 16. STATUTES. Citations to an entire statute in the U.S. Code include (1) the official name of the act and (2) the U.S.C. citation. All components are in ordinary roman type, and there should be a non-breaking space after the section symbol. If citing an individual provision, do not include the title of the act.

- **Example:** Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9601–9675.
- **Example:** 42 U.S.C. § 9602.

If a statute's provisions are scattered throughout the code so that no useful citation to the code is possible, cite to the session laws.

- **Example:** Tax Reduction Act of 1975, Pub. L. No. 94-12, 89 Stat. 26 (codified as amended in scattered sections of 26 U.S.C.).

Part II. Style Guidelines

A. General

RULE 17. CAPITALIZATION OF SPECIFIC TERMS.

Administration. Always capitalize administration when referring to a specific presidential administration, regardless of whether the administration is named explicitly, but use lowercase if referencing administrations in general or an administration in the abstract.

- **Example:** The Trump Administration released a budget proposal.
- **Example:** Regulatory policy can change drastically over the course of two administrations.

Branches of Government. Do not capitalize the government branch, even when referring to the federal government (e.g., legislative branch, judicial branch, executive branch). Do capitalize specific bodies within the branch (e.g., Congress, the White House, the U.S. Supreme Court).

ACUS Terms. When referring to ACUS, capitalize Council, Assembly, Conference, Office of the Chairman, Public Members, and Government Members. When referring to a specific plenary session, capitalize Plenary and Session. Capitalize “paragraph” when referring to a specific numbered paragraph in a recommendation (RULE 35). Capitalize “recommendation” when referring to a specific recommendation (RULE 36).

RULE 18. COMPOUND AND HYPHENATED WORDS. Use a hyphen when a compound adjective precedes a noun, or when a compound noun acts as an adjective. Hyphenate if two or more consecutive words make sense only when understood together as an adjective before a noun that follows.

- **Example:** Full-time job
- **Example:** The short-term benefits of the rule outweigh its costs in the long term.

Do not use a hyphen when the compound modifier occurs after the verb.

- **Example:** The employee's job became full time.

Do not hyphenate if a two-word phrase contains an adverb ending in -ly followed by an adjective, when the phrase consists of a proper noun, or when a phrase is borrowed from a non-English language.

- **Example:** Federally recognized tribe

- **Example:** A group of United States officers
- **Example:** Ad hoc committee

The following are the rules for specific compound words that frequently appear in ACUS documents.

- *Decision making.* Write as two words (i.e., “decision making”) when using it as a noun. Hyphenate when used as an adjective (e.g., “the decision-making process”).
- *Notice-and-comment.* Hyphenate when using as an adjective (e.g., “notice-and-comment rulemaking”). *Do not* hyphenate when using it as a noun (e.g., “a period of notice and comment”).
- *Policymaking.* Policymaking is always one word.
- *Rulemaking.* Rulemaking is always one word.
- *Website and Webpage.* Write “website” and “webpage” as one word, *not* “Web site” or “Web page.”

RULE 19. DATES. Always use Arabic figures, without st, nd, rd, or th.

- **Example:** The rule was issued on December 5.
- **NOT:** The rule was issued on December 5th.

When a phrase lists only a month and year, do not separate with commas.

- **Example:** HHS will launch a new initiative in May 2016

When a phrase refers to a month, day, and year, set off the year with commas.

- **Example:** April 5, 2011, is her birthday.

The word “century” should not be capitalized unless it begins a sentence.

RULE 20. ELLIPSES. Ellipses should be typed out with a space between periods, rather than using auto-generated ellipses.

- **Example:** Executive Order 12866 states, “Each agency shall assess both the costs and the benefits of the intended regulation and . . . propose or adopt a regulation only upon a reasoned determination that the benefits of the intended regulation justify its costs.”
- **NOT:** Executive Order 12866 states, “Each agency shall assess both the costs and the benefits of the intended regulation and...propose or adopt a regulation only upon a reasoned determination that the benefits of the intended regulation justify its costs.”

RULE 21. EN AND EM DASHES. Use an en dash (–) when citing materials that span multiple pages, sections, or paragraphs. When inserting a dash to set off additional information or modify a clause, use an em dash (—). Do not insert a space between dashes.

- **Example:** 5 U.S.C. §§ 556–57.

- **Example:** The Administrative Conference of the United States—an independent federal agency located within the executive branch—is tasked by statute with recommending improvements to federal administrative procedure.

Note. En dashes may be created by selecting Ctrl + hyphen (-) (on the numeric keypad). Create em dashes by selecting Ctrl + Alt + hyphen (-) (on the numeric keypad).

RULE 22. NUMBERS. Spell out the numbers one through ten, and use numerals for numbers larger than ten. When a number is four digits or greater, separate every three digits by a comma, except in citations to pages, statutes, volume numbers, internet database locators, docket numbers, the U.S. Code, or other sources whose classification systems do not themselves include commas. Avoid following a written-out number with a digit in parentheses.

- **Example:** There are three new executive orders.
- **NOT:** There are three (3) new executive orders.

Always use Arabic numerals in the context of ages, percentages, ratios, fractions, and when preceding *million*, *billion*, *trillion*, etc. This applies even when numbers less than 10 are used to describe an age, percentage, or ratio. Spell out numbers that begin a sentence.

Exceptions to the above rule: Simple fractions may be spelled out. When referring to ACUS plenary sessions or referring to a Circuit Court in a citation to a case, ordinal numbers should not be spelled out, and the ordinal suffix should not be in superscript.

- **Example:** 72nd Plenary Session
- **Example:** United States v. MacDonald, 531 F.2d 196 (4th Cir. 1976).

RULE 23. OXFORD COMMA. Use the Oxford (or “serial”) comma in lists of three or more terms.

- **Example:** The SEC, CFPB, and FTC engage in notice-and-comment rulemaking and administrative adjudication to achieve policy ends.
- **NOT:** The SEC, CFPB and FTC engage in notice-and-comment rulemaking and administrative adjudication to achieve policy ends.

RULE 24. SEMICOLONS AND COLONS WITHIN LISTS. When individual terms within a list include commas, begin the list with a colon and separate items using semicolons.

- **Example:** Guidance documents can be useful for: binding lower-level agency officials to a particular course of action; communicating agency policy to regulated parties, regulatory beneficiaries, and the general public; and fleshing out specific applications of agency rules.
- **NOT:** Guidance documents can be useful for binding lower-level agency officials to a particular course of action, communicating agency policy to regulated parties, regulatory

beneficiaries, and the general public, and fleshing out specific applications of agency rules.

RULE 25. SPACING. Only include one space following a period. There should be a non-breaking space between section and paragraph symbols and the sections or paragraphs they modify.

- **Example:** 5 U.S.C. § 551.
- **NOT:** 5 U.S.C. §551.

- **Example:** Recommendation 2016-3, *supra* note 2, ¶ 1.
- **NOT:** Recommendation 2016-3, *supra* note 2, ¶1.

Note. To insert a non-breaking space, simultaneously click Ctrl + Shift + Space or go into symbols and select it from the list of special characters.

RULE 26. TYPE AND FONT. The main text of documents is in Times New Roman, 12-point font, and left-aligned. Footnotes should be Times New Roman, 10-point font, and left-aligned.

RULE 27. URL LINKS. In citations, a URL should be a clickable hyperlink, but the URL text should be in ordinary roman type (i.e., the text should not be blue or underlined).

Note. If a URL breaks across two lines, insert a “no-width optional break” in a location that minimizes unnecessary white space. To insert a break in Microsoft Word on a PC, move the cursor to the location where the break will be inserted, then select the menu options as follows: Insert > Symbol > More Symbols > Special Characters (tab at the top) > No-Width Optional Break. To insert a break in Microsoft Word on a Mac, move the cursor to the location where the break will be inserted, open the Character Viewer (Shortcut: Control + Command + Space), and locate and insert “Zero Width Space.”

- **Example:** *BLS Announcement Page*, U.S. DEP’T OF LAB., <https://www.bls.gov/bls/announcement.htm> (last visited Jan. 13, 2021).

RULE 28. USE OF “WHERE.” Refrain from using “where” as a situational replacement for “if,” “when,” or “in which.”

- **Example:** When agencies communicate with the public, plain language officials can provide a valuable coordination function.
- **NOT:** Where agencies communicate with the public, plain language officials can provide a valuable coordination function.

RULE 29. USE OF “WHILE.” Do not use “while” when “even though” is the intended meaning; “while connotes temporality, and it should only be used in that context. Instead, use “although,” “whereas,” or a similar term.

RULE 30. USE OF THE VERB “TO CITE.” When using the verb “to cite” always use the phrasing “cite a” not “cite to a.”

- Example: The court cites a case that discusses the Administrative Procedure Act.
- NOT: The court cites to a case that discusses the Administrative Procedure Act.

B. Government Entities and Publications

RULE 31. ABBREVIATIONS. Abbreviations and acronyms should not be overused, particularly if they are long or unfamiliar. Abbreviations must be introduced in parentheses immediately following the words being abbreviated. Do not use quotation marks.

- **Example:** Administrative Procedure Act (APA)
- **NOT:** Administrative Procedure Act (“APA”)

Terms abbreviated in the preamble should be set out in full in the text of the recommendation section and re-abbreviated when necessary.

Abbreviate agencies according to what each agency uses to refer to itself. Remember when using abbreviations for agencies that they are treated as singular, collective nouns.

RULE 32. ITALICIZATION OF CASE NAMES. Adhere to the following rules in regard to the *italicization* of case names:

- A case name (whether the full name or a shortened version) is always italicized when used within the text of a document (i.e., above the line).
- A case name is not italicized in a full case citation in a footnote, although procedural phrases (such as “*In re.*” and “*ex rel.*”) should be italicized.
- A case name in a short-form citation in a footnote should always be italicized.

RULE 33. ITALICIZATION OF OFFICIAL SOURCES. The terms *United States Code*, *Code of Federal Regulations*, and *Federal Register* must be italicized. Do not capitalize or italicize the word “the” before any of these sources.

RULE 34. UNITED STATES. When used as a noun, use “the United States.” When used as an adjective, use “U.S.” Periods should be inserted between U and S, with no spaces.

- **Example:** Washington, D.C., is within the United States.
- **Example:** The U.S. Food and Drug Administration announced new pharmaceutical guidelines.

C. ACUS-Specific Rules

RULE 35. FOOTNOTES. Footnotes should be used sparingly. Staff should not include footnotes within the numbered paragraphs of a recommendation without first speaking with the Research Director.

RULE 36. FORMATTING OF VERTICAL LISTS. Each item in a vertical list must be marked by a letter of the alphabet that is followed by a period and not enclosed in parentheses. The first letter of each list item must be capitalized. Items are to be separated by semicolons. If the list has more than two items, the word “and” or “or” must appear after the final semicolon.

- **Example:**
 - a. Rules;
 - b. Regulations; and
 - c. Litigation

If you are referring back to an item in a list formatted this way, refer to it by the letter in parentheses.

- **Example:** As noted above in (a)

RULE 37. HEADINGS. Headings within the preambles of recommendations align with the text they precede. They are written in ALL CAPS in **bold**, 12-point font. The heading of the recommendation section should be singular (i.e., “**RECOMMENDATION**,” *not* “**RECOMMENDATIONS**”).

Capitalize words in a heading or title, including the initial word and any word that immediately follows a colon. Do not capitalize articles, conjunctions, or prepositions when they are four or fewer letters, unless they begin the heading or title, or immediately follow a colon.

RULE 38. REFERENCES TO NUMBERED PARAGRAPHS. When referring to numbered paragraphs in a recommendation, capitalize the “P.”

- **Example:** As noted in Paragraph 4 below, agencies are encouraged to seek public input.

RULE 39. REFERENCES TO RECOMMENDATIONS WITHIN THE TEXT OF DOCUMENTS. When referring to named ACUS recommendations within the text of documents, use the word “Recommendation” followed by the recommendation’s number, a comma, and the italicized title of the recommendation. If the title is not the end of the sentence, place a comma after the title as well.

- **Example:** In so doing, they should be guided by the principles set out in Recommendation 2018-5, *Public Availability of Adjudication Rules*.

The word “recommendation” is capitalized when referring to a specific recommendation (e.g., “In this Recommendation . . .”).

- **Example:** This Recommendation offers best practices and factors for agencies to consider as they seek to increase the accessibility of adjudication materials on their websites.
- **NOT:** This recommendation offers best practices and factors for agencies to consider as they seek to increase the accessibility of adjudication materials on their websites.